

1 IN THE CIRCUIT COURT OF CALLAWAY COUNTY
2 STATE OF MISSOURI
3 JEANNETTE QUINN, individually and)
4 on behalf of all others similarly)
5 situated,)
6)
7 Plaintiff,)
8)
9 vs.)
10)
11 PLATINUM TEAM MANAGEMENT, INC.,)
12 et al.,)
13)
14 Defendants.)
15
16
17
18 VIDEOTAPED DEPOSITION OF AMY O'BRIEN
19 FEBRUARY 22, 2023
20
21 (Deposition Starting Time: 8:59 a.m.)
22
23
24
25

EXHIBIT
1

Case No. 22CW-CV00644

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12 VIDEOTAPED DEPOSITION OF AMY O'BRIEN, produced,
13 sworn and examined on February 22, 2023, between the hours of
14 8:59 a.m. and 2:45 p.m. of that day, at the Lear Werts Law
15 Offices, 103 Ripley Street, Columbia, Missouri, before
16 J.D. Martin, Certified Court Reporter and Notary Public
17 within and for the State of Missouri, in a certain cause now
18 pending in the Circuit Court of Callaway County, State of
19 Missouri, in re: JEANNETTE QUINN, individually and on behalf
20 of all others similarly situated vs. PLATINUM TEAM
21 MANAGEMENT, INC., et al.; on behalf of the Plaintiff.

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JOE O'BRIEN

14

15 VIDEOGRAPHER:

CHRIS TOBIN
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15

16

17

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19

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25

1 It is hereby stipulated and agreed by and
2 between counsel for Plaintiff and counsel for Defendants
3 that this deposition may be taken in shorthand by
4 J.D. Martin, CCR and Notary Public, and afterwards
5 transcribed into printing, and signature by the witness
6 expressly waived.

7 * * * * *

8 AMY O'BRIEN
9 of lawful age, produced, sworn, and examined on behalf of the
10 Defendants deposes and says:

11 EXAMINATION

12 QUESTIONS BY MR. WERTS:

13 **Q. Good morning.**

14 A. Good morning.

15 **Q. Could you please tell us your name?**

16 A. Amy O'Brien.

17 **Q. Ms. O'Brien, have you ever given a deposition**
18 **before?**

19 A. On a video.

20 **Q. Okay.**

21 A. Zoom. One time.

22 **Q. When was that?**

23 A. I don't know the exact date. But probably July of
24 '22.

25 **Q. Was the deposition you gave in July of 2022 related**

1 to your work at all?

2 A. Yes.

3 Q. What was the nature of that case?

4 A. It was the Department of Labor, I believe. I gave
5 it to an attorney group.

6 Q. Do you remember -- this is going to be one of those
7 dumb lawyer questions -- was anyone else at the deposition
8 with you?

9 A. Yes.

10 Q. Who else was on the deposition? Or Zoom call?

11 A. On Zoom. It was an attorney. I'm not going to
12 recall his name right now though.

13 Q. Just the one attorney from the Department of Labor?

14 A. No. Representing Platinum. I think it's -- John
15 Brown might be his name.

16 Q. Okay. And the Department of Labor -- was that the
17 United States Department of Labor, the Missouri Department of
18 Labor or some other Department of Labor?

19 A. I don't think I know.

20 Q. Okay. What was the nature of the investigation
21 that the Department of Labor was looking into in that
22 deposition?

23 A. Missed payroll and benefits. And I'm not sure -- I
24 know the Department of Labor has two different divisions for
25 that. And so I honestly can't remember which one we were

1 talking about at the time.

2 Q. Okay. And it is ironic that the health insurance
3 premiums people or the payroll people -- it doesn't make any
4 sense to you -- that's not you. And so were you talking
5 about both payroll and benefits?

6 A. I believe I was.

7 Q. Okay. How long did the deposition last?

8 A. Because I didn't know they were separate until
9 probably just a month or so ago.

10 Q. Okay. How long did the deposition last?

11 A. Almost three hours.

12 Q. Have you seen a copy of the transcript since the
13 deposition?

14 A. Huh-uh.

15 Q. Was that a no?

16 A. Oh. No, I'm sorry.

17 Q. Had you ever met John Brown before that deposition?

18 A. No.

19 Q. What did you do to get ready for that deposition?

20 A. Oh, I did meet John Brown before that. So maybe
21 the day or week before I talked to him before the deposition.

22 Q. How long did you and Mr. Brown speak at that time?

23 A. Probably an hour.

24 Q. And I don't want you to tell me anything that the
25 two of you spoke about. Was anyone else present during that

1 meeting?

2 A. I think that we had Jeff Stone, the CEO of Callaway
3 Hospital. And Christy Smiley, the HR Manager.

4 Q. Was Ms. Smiley the HR Manager for the Audrain
5 facility, Callaway facility or both?

6 A. Both.

7 Q. When you were talking with those folks in advance
8 of your deposition did you look at any documents?

9 A. I mean not that -- I don't know.

10 Q. Okay. Can you tell us your current address?

11 A. 714 Sunset Lane, Mexico, Missouri.

12 Q. How long have you been at that address?

13 A. May of '21.

14 Q. Is that your only home?

15 A. Yes.

16 Q. And your husband, Joe, is with you here today for
17 the deposition, correct?

18 A. Correct.

19 Q. Is Joe your attorney?

20 A. No.

21 Q. Does Joe -- or has Joe ever had any employment
22 position with either the Audrain or Callaway County
23 hospitals?

24 A. No.

25 Q. Any position with any of the many companies we're

1 going to be talking about today?

2 A. No.

3 Q. Okay. He's just here for you for support.

4 A. Yes.

5 Q. All right. So you have given a deposition before,
6 so I won't belabor kind of the background stuff, particularly
7 since you don't have your own attorney here, so we can talk
8 about this.

9 Our purpose here today is for me to ask some
10 questions and to learn some things, and you to provide some
11 answers under oath. Is that your understanding?

12 A. Yes.

13 Q. Okay. And it's not a memory contest. And so the
14 best is just what you know in your head as we go along. You
15 have done a good job so far -- if you know the answer, we
16 would ask you to answer truthfully. If you don't know the
17 answer, tell me, and maybe I can ask a better question.
18 Okay?

19 A. Okay.

20 Q. It's also not an endurance question. If you want
21 to take a break, just tell me. I see they have over here --
22 you brought your own bottle of water -- we have got a variety
23 of beverages. If you need something, just let us know and
24 we'll take a break as we go along.

25 This room can get stuffy. If that happens tell me

1 and we can crack a window or turn up the AC or something.

2 It's not intended to be a interrogation under bright lights,
3 even though it may feel that way with the video camera.

4 The one thing I will ask is that your answers kind
5 of be full words. Yes's and no's.

6 A. No head shakes.

7 Q. Exactly. And J.D. is really good. But the
8 spelling of uh-huh and huh-uh isn't all that different.

9 A. I understand.

10 Q. So, I will know exactly what you mean. And if I
11 correct you, I'm not trying to be a jerk. It's just matter
12 or -- it may actually save time later on, okay?

13 MR. WERTS: Okay. With that, let's start with
14 this.

15 (Exhibit 1 was marked for the purpose of
16 identification herein.)

17 Q. (By Mr. Werts) I'm handing you what we are marking
18 for today as Exhibit 1. Have you seen Exhibit 1 before?

19 A. Yes.

20 Q. Okay. When did you first see Exhibit 1?

21 A. When the guy found me in the parking lot and gave
22 it to me. But I'm not going to know the date.

23 Q. Fair enough. About a month ago?

24 A. I would say so.

25 Q. Okay. If I told you that our process server said

1 it was January 17, 2023, would you have any reason to dispute
2 that?

3 A. No.

4 Q. And so if you will turn to the third page of
5 Exhibit 1, it has a list of documents on it. Do you see
6 that?

7 A. Yes.

8 Q. Okay. And the copy of the subpoena that you were
9 served on January 17th had this list of documents attached to
10 the subpoena. Is that true?

11 A. True.

12 Q. And did you also get a check in the amount of
13 \$69.77?

14 A. Yes.

15 Q. Did you cash the check?

16 A. No.

17 Q. Okay. You should have. That's yours. So --

18 A. There is no way to negotiate the rate?

19 Q. Write your Congressman. The rate is ridiculous.
20 But the Missouri State legislature set that rate I think
21 sometime in the 60's, and refuses to revisit it.

22 A. Why do our doctors get to charge \$500 an hour then?

23 Q. Because they are testifying as an expert. And
24 there is a different rule for them.

25 A. What am I testifying as today?

1 Q. As yourself, actually.

2 A. An employee of these various groups?

3 Q. We're actually going to find that out as we go
4 along.

5 A. Okay.

6 Q. I'll be very honest with you. This is kind of an
7 interesting deposition. I normally know the answers to all
8 of these questions before we sit down and do this for a day.
9 I really don't today. So this is going to be a journey of
10 discovery for all of us.

11 A. Okay.

12 Q. J.D. is cringing. Because he knows that means it
13 takes longer. But we will try to go through it as easily as
14 we can.

15 Did you bring any documents with you today?

16 A. I did bring a -- so I am not the custodian of the
17 documents. But because I have been involved in the various
18 ownership changes -- and the most recent one trying to get
19 them to find a way to get us W-2's -- I did get access to the
20 payroll files. So I put them on a disk.

21 Q. Okay. And --

22 A. And I don't know if it's everything that you need.
23 But it's all I have.

24 Q. We will start with that. Okay. So you have
25 handed me a thumb drive. And everything that you brought

1 **today is on this.**

2 A. Except for -- this is the number 1, the ownership
3 sale. That's the document that I had access to.

4 **Q. And is this -- so there are a couple of different**
5 **headings. Is this one document or two documents?**

6 A. It's two documents.

7 **Q. Okay.**

8 A. And I don't know why. But there is two.

9 MR. WERTS: Okay. So I'm going to mark these.

10 (Exhibits 2 and 3 were marked for the purpose of
11 identification herein.)

12 **Q. (By Mr. Werts) As Exhibits 2 and 3 -- can you tell**
13 **me what Exhibit 2 is?**

14 A. Exhibit 2 is a unanimous resolution for Noble
15 Health Corp.

16 **Q. Okay. And then what is Exhibit 3?**

17 A. Exhibit 3 is a unanimous resolution for Noble
18 Health Services, Incorporated.

19 **Q. We're going to kind of set these in the middle for**
20 **now.**

21 MR. WERTS: And Matt, I'll make copies of them on a
22 break.

23 MR. STROMBERG: Thank you.

24 **Q. (By Mr. Werts) And then this is going to be a**
25 **really technical question. How much stuff is on this?**

1 A. I don't know the answer to how many files there
2 are. Because there are folders and there are files in
3 folders. It says payroll files.

4 Q. Okay.

5 A. So I moved it and put it on there.

6 Q. Okay. And so if I described it as a bunch of
7 stuff, would that be a fair description?

8 A. Yes.

9 Q. Okay. I was just trying to decide if it has -- the
10 nature of a thumb drive is could have one file that has one
11 page or it could have quite a bit on it.

12 A. I'll bet there is a thousand files.

13 Q. Okay. We're going to circle back to that then.
14 Okay. So, when you were looking -- looking back to Exhibit 1
15 -- and you have it in front of you.

16 A. Okay.

17 Q. And specifically Attachment A. When you were
18 looking for documents responsive to Attachment A, can you
19 tell me how you went about looking for those documents?

20 A. I called the person who used to be the Controller.

21 Q. Okay.

22 A. And asked her where I might be able to find them.
23 And she told me that there was a drive that had the payroll
24 files on it. But at the time that I asked her that, was when
25 I was trying to get information for W-2's.

1 **Q. Okay.**

2 A. And that's how I found the payroll files. And then
3 when I saw it on here I said well, that's what I have. And I
4 can make a copy for you.

5 **Q. Okay. What else did you do to look for documents?**

6 A. Oh, the first one -- the ownership sale -- I knew
7 that when the ownership changed from Noble to Platinum, I had
8 these two documents that I was sending for the hospital
9 licensure -- those kinds of things. So I had copies of those
10 in my e-mail. And that's where I went to get those.

11 **Q. What is the e-mail address of that account, please?**

12 A. amy.obrien@noblehc.org.

13 **Q. Are you still actively using that e-mail account
14 for work?**

15 A. Yes. Well, I'm not employed right now. But it's
16 still active.

17 **Q. Okay. Do you still have access to it?**

18 A. Yes.

19 **Q. How long have you been using that e-mail account?**

20 A. Since Noble gave it to me in March -- I think it
21 was March of '21. It could have been February. I started
22 with them February 15th. But I'm not exactly sure when I got
23 my Noble e-mail.

24 **Q. Did you have another e-mail account prior to the
25 Noble e-mail account associated with your work at the**

1 hospital?

2 A. No.

3 Q. Okay. Anywhere else that you looked?

4 A. No.

5 Q. So you indicated -- and we're going to spend plenty
6 time on this topic. But just to kind of orient myself --
7 you're no longer employed, correct?

8 A. Correct.

9 Q. How did you get access to the drive that had the
10 payroll information, if you're no longer employed?

11 A. The current owners are contracting with me on an
12 hourly basis to help get them information that they need.
13 And in this particular one was to try and help get W-2's to
14 people.

15 Q. All right. So who are the current owners that
16 you're referring to?

17 A. I believe it's called Pasture Medical. I haven't
18 seen this for that group yet.

19 Q. Okay.

20 A. But that is who is paying me. Pasture Medical.

21 Q. Where are they from?

22 A. New Jersey. The company is established in Wyoming,
23 I think.

24 Q. Is Pasture Medical a corporation, an LLC or some
25 other type of entity?

1 A. I don't know.

2 Q. Okay. Does Pasture Medical use any other
3 subsidiary or other names that you have seen?

4 A. The original name that I saw was Saint Pio of
5 Pietrelcina. But I haven't seen that name since December.

6 Q. Do you have an understanding one way or the other
7 whether there is a relationship between Pasture Medical and
8 Saint Pio of Pietrelcina?

9 MR. WERTS: I will get you the spelling.

10 THE WITNESS: Say that question again.

11 Q. (By Mr. Werts) Was there any relationship between
12 those two entities?

13 A. Not that -- I don't know that. I don't know.

14 Q. Okay. Who is the person who is in charge and at
15 the top of Pasture Medical?

16 A. The one I talk to the most is called -- his name is
17 call Kalman Groner. K-a-l-m-a-n. G-r-o-n-e-r. And Gary
18 Greenstein is the other.

19 Q. Are you familiar with the name Cliff Sullivan?

20 A. Yes. That was who I talked to at Saint Pio.

21 Q. Have you spoken to Mr. Sullivan since you started
22 dealing with the folks at Pasture Medical?

23 A. No.

24 Q. Do you know whether or not Saint Pio sold some or
25 all of the hospitals to Pasture Medical?

1 A. I believe they have. But I haven't seen --

2 Q. And this is one of those -- there are going to be
3 lots of these today, unfortunately, goofy lawyer questions.
4 Why do you believe that?

5 A. Because that's who is asking me to do things.

6 Q. Okay. Lots of instructions. Not lots of
7 explanations.

8 A. Yes.

9 Q. Got it. How much time per week are you currently
10 working with your contract arrangement with the folks at
11 Pasture Medical?

12 A. Eight to -- I think the last one I turned in was
13 maybe -- the biggest one was 17 hours in a week. But eight
14 was the shortest. And that's been four times. Four weeks.

15 Q. How much are they paying you for that, ultimately?

16 A. 150 an hour.

17 Q. Are they paying you to appear for this deposition
18 today?

19 A. No.

20 Q. Do they know you're giving this deposition today?

21 A. Yes.

22 Q. How do they know that?

23 A. I asked them to supply legal counsel.

24 Q. And what did they say?

25 A. They didn't.

1 **Q. Are you indicating they didn't supply legal**
2 **counsel? Or they didn't say one way or the other?**

3 A. They didn't say one way or the other. I sent a
4 Certified Letter to all of the Noble owners that I was aware
5 of.

6 **Q. Okay. When did you send that letter?**

7 A. I'm not going to remember this -- around January
8 25th or 26th.

9 **Q. Okay.**

10 A. When did I get served? On the 17th?

11 **Q. Yes, ma'am. So about a week later.**

12 A. Yeah.

13 **Q. Do you have a copy of that letter?**

14 A. I didn't bring it with me.

15 **Q. Okay. But you do have a copy somewhere?**

16 A. Yeah. It's on my computer.

17 **Q. Okay. So you're currently contracted with Pasture**
18 **Medical, correct?**

19 A. Well, I told them last week that I'm done.

20 **Q. Okay.**

21 A. I'm getting a new job. So --

22 **Q. Okay. Where is the new job at?**

23 A. In Mexico. Their Economic Development Director.
24 That was the call I just took.

25 **Q. Oh, okay. Accepting the new job?**

1 A. Yes.

2 Q. Congratulations. So now Joe knows.

3 MR. WERTS: You know she's telling the truth.

4 THE WITNESS: Yeah.

5 JOE O'BRIEN: Six months without a paycheck. So --

6 MR. WERTS: And I understand that. And I kind of
7 get that you're the one left holding the bag. But you're
8 also the only person whose name I know that I can get
9 answers. So, unfortunately you're it.

10 THE WITNESS: I'm willing to help.

11 MR. WERTS: I appreciate that.

12 Q. (By Mr. Werts) Okay. When did you first become
13 contracted with Pasture Medical?

14 A. When did I get the first payment from them? Or
15 when did I do the first work?

16 Q. When did you first have an agreement with them?

17 A. I'm not going to remember the date. But when they
18 called and started out -- you know, they needed a lot of
19 information. They just took this over. And I just said I
20 can't do it for free because I have been working for free
21 since August.

22 And so I can't remember if it was right after
23 Christmas it seems like -- and then I started. And I don't
24 remember all I have done for them. But I just -- just
25 whatever they needed, I would get that information to them.

1 So I think right after Christmas.

2 **Q. Okay. So around the end of the year, first of the**
3 **year --**

4 A. Yeah.

5 **Q. -- in that kind of weird time.**

6 A. Yeah. I want to say they told me December 28th was
7 their date. I think Saint Pio's date was December 7th. So,
8 it's probably in those time frames.

9 **Q. Okay. So when you were first contacted by Pasture**
10 **Medical, who first contacted you?**

11 A. Kalman Groner.

12 **Q. What did he tell you in that conversation?**

13 A. That they had a desire to open the hospital. Get
14 to -- help the community get health care back into the
15 community. That they were excited about it. And that they
16 needed my help in learning more about the hospital.

17 **Q. Okay. At that point were any representations made**
18 **to you about whether or not Pasture Medical had bought**
19 **anything?**

20 A. No. Not --

21 **Q. That wasn't a great question. Let me try a little**
22 **bit better.**

23 So they indicated they had an interest in reopening
24 the hospital.

25 A. Yes.

1 Q. Did they tell you that they had acquired the
2 hospitals?

3 A. I don't know what words they used. But it made me
4 believe that they were the new owners.

5 Q. Okay.

6 A. But I'm not sure what words he used with me.

7 Q. Okay.

8 A. And I wasn't sure if he and Cliff Sullivan were
9 partners. I still don't know what their relationship is.

10 Q. Okay. But you were kind of left with the
11 impression -- and correct me if I'm wrong about this -- that
12 Mr. Groner's group, Pasture Medical, was in charge after
13 December 28th.

14 A. Yes.

15 Q. Okay. Was anyone else in charge after December 28,
16 2022?

17 A. Gary Greenstein -- he's the other one that I have
18 talked to.

19 Q. Okay. And do you know what Mr. Groner's position
20 with Pasture Medical is?

21 A. I do not.

22 Q. Do you know what Mr. Greenstein's position is?

23 A. I don't.

24 Q. Have you ever heard any job titles for either of
25 them?

1 A. No.

2 **Q. Have you ever heard of any other entities or**
3 **companies that either of them are associated with?**

4 A. I Googled Kalman Groner and saw that he's
5 associated with Kangaroo Partners. I Googled Gary
6 Greenstein, and that he's an attorney.

7 **Q. Okay. In what state?**

8 A. New York. And I don't remember the name of his
9 group.

10 **Q. Okay. Since you started talking with the folks at**
11 **Pasture Medical have any -- have either -- I'm going to start**
12 **entirely over.**

13 **Have you spoken with anyone else at Pasture Medical**
14 **besides Mr. Groner or Mr. Greenstein?**

15 A. Yes. But I don't know their names.

16 **Q. Okay. How many such folks?**

17 A. Two.

18 **Q. Male or female?**

19 A. One male, one female.

20 **Q. Do you have an understanding of what either the**
21 **male or the female unknown people's role are?**

22 A. Actually there is one or more. There is another
23 male. They are a CPA.

24 **Q. Okay.**

25 A. I don't know the roles of the other two that were

1 on the Zoom call.

2 Q. Just one Zoom call?

3 A. No. We've had about four.

4 Q. Okay. And have you been communicating with these
5 folks through e-mail like for scheduling the Zoom calls and
6 other things?

7 A. Uh-huh.

8 Q. Is that a yes?

9 A. Yes.

10 Q. Help you out. Is that the amy.obrien@noblehc.org
11 e-mail?

12 A. Yes.

13 Q. Have you used any other e-mail account when talking
14 with the folks at Pasture Medical?

15 A. Probably my personal g-mail account,
16 obrien5553@gmail.com.

17 Q. O'Brien 53 --

18 A. 5553. So, 55-53.

19 Q. And in either of those e-mail accounts is there an
20 apostrophe in the O'Brien?

21 A. No.

22 Q. It's just O straight to B in both cases?

23 A. Yes.

24 Q. Do you currently have any other e-mail accounts
25 besides those two?

1 A. Yes. I have the obrien5553@yahoo.com also. And I
2 had a Platinum e-mail account.

3 Q. What was that?

4 A. I'm trying to remember it. That one has been
5 deactivated. I think it was aobrien@platniumhealthsys.org.

6 Q. Was that the only Platinum e-mail account that you
7 had?

8 A. Yes.

9 Q. Have you had any other e-mail accounts of any kind
10 going back to August 16, 2019?

11 A. No.

12 Q. Going back to August 16, 2019, have you used any
13 other electronic messaging program or app related to any of
14 your work at the hospitals?

15 A. Teams.

16 Q. Okay. Anything else?

17 A. Zoom.

18 Q. Okay.

19 A. I think that's all.

20 Q. Okay. And I'll just name a couple of others
21 sometimes people forget. Have you ever used a program called
22 Slack in any of your work at the hospitals?

23 A. No.

24 Q. Have you ever used a program called What's App for
25 any of your work at the hospitals?

1 A. Yes. Only with Pasture.

2 Q. What is your user name or handle for the What's App
3 account?

4 A. Will it be on my phone?

5 Q. It likely will be, if you want to look.

6 A. I don't know where to find it.

7 Q. And I don't know that program at all. So I'm not
8 very much help. It's often times --

9 A. I'll go to my settings.

10 Q. Yeah.

11 A. It looks like it's just Amy O'Brien and then my
12 phone number, 319-208-4382.

13 Q. Okay. Have you ever used Linked In -- the
14 messenger function for any of the work with the hospitals?

15 A. No.

16 Q. And when I'm using the phrase work at the
17 hospitals, I mean that to include hospitals, clinics --

18 A. Sure.

19 Q. -- Audrain, Callaway. All of it. Okay?

20 A. I have used Linked In just for work -- I mean like
21 professional communication to link with somebody or ask them
22 a question about what they do.

23 Q. Okay. Any of it to do with any of the owners --

24 A. No.

25 Q. -- or management above you?

1 A. No.

2 Q. Have you ever used Facebook Messenger to talk with
3 any of these folks?

4 A. No.

5 Q. Ever use Snap Chat to talk to any of these folks?

6 A. No.

7 Q. After going through that list, any other apps?
8 Because there is an infinity number.

9 A. None that come to mind. I forgot about What's App.
10 But that one was just the most recent. And we were just
11 using e-mail and Teams most of the time.

12 Q. Okay. And the phone number -- 319-208-4382 -- is
13 that your primary mobile number?

14 A. Yes.

15 Q. Did you have any other phone numbers in the time
16 period of August 16, 2019 to the present?

17 A. No.

18 Q. Do you have any other work numbers for the time
19 period August 16, 2019?

20 A. I had a desk phone.

21 Q. Okay.

22 A. But they were shut off.

23 Q. Okay.

24 A. So they were not working.

25 Q. What was that phone number?

1 A. 572-58 -- 573-582-8103.

2 Q. So you said the folks at Pasture Medical wanted a
3 bunch of information from you. Is that a yes?

4 A. Yes.

5 Q. Okay. That's okay. It's going to happen a hundred
6 times today. It will be perfectly fine. What did they want?

7 A. They wanted to know information about the hospital.
8 With regard to Callaway Hospital they were filing a
9 bankruptcy, and they needed to know some of the vendors at
10 Callaway. I didn't know the vendors at Callaway. So I went
11 to the accounts payable office and got some of the vendors
12 that they needed.

13 Q. To your knowledge has a bankruptcy been filed with
14 relationship to the Callaway Hospital?

15 A. Yes.

16 Q. When was that filed?

17 A. It was the Friday before February 13th. So that
18 would have been the 10th. February 10th.

19 Q. And do you know who it is that filed bankruptcy?

20 A. Noble Real Estate was one them. There was another,
21 I don't remember.

22 MR. WERTS: Okay. I have not received any notice
23 of a bankruptcy filing. Have you, Matt?

24 MR. STROMBERG: I have seen one, yes.

25 MR. WERTS: Who is it? Do you know?

1 MR. STROMBERG: It's a clinic. I think Fulton
2 Medical Clinic.

3 THE WITNESS: Fulton Medical Clinic.

4 MR. STROMBERG: I think is the other one.

5 MR. WERTS: It's not one of the Defendants here?

6 MR. STROMBERG: Let me check.

7 MR. WERTS: It's not yours.

8 MR. STROMBERG: No. I don't think so, no.

9 MR. WERTS: I would have expected to have heard
10 from them by now. So kind of based on that representation
11 I'm going to kind of keep going. Because I don't have any
12 notice.

13 MR. STROMBERG: There are automatic statements.
14 So, carry on.

15 MR. WERTS: Well, you're not the one to be mad at
16 me about it. But I don't want to -- this is one of the
17 bankruptcies that is --

18 MR. STROMBERG: Yeah.

19 MR. WERTS: -- to break with the automatic
20 statement. And we will check it on a break. I'm okay with
21 where we're at.

22 **Q. (By Mr. Werts) Okay. When you were sending**
23 **information to Pasture Medical did you send it all through**
24 **that e-mail account we have been talking about?**

25 A. Yes.

1 Q. Did you use any other file transfer websites --
2 Share Point or Share File -- to transfer information?

3 A. No.

4 Q. Are you familiar with what I mean on those types of
5 websites?

6 A. Yes.

7 Q. Okay. But everything that you would have sent to
8 the folks at Pasture was either in that NobleHC e-mail
9 account --

10 A. Yes. They wanted information on the employee
11 retention credits that Noble Health filed. And they wanted
12 information on the HRSA provided relief funds application
13 that we had filed and asked for a reconsideration on, and
14 didn't get a response. So those are the kind of things I was
15 looking up for them.

16 Q. Okay.

17 A. As well as the W-2 information.

18 Q. Were you able to find the W-2 information?

19 A. I was able to give them the payroll information for
20 2022.

21 Q. Do you know whether or not Pasture Medical has
22 issued out W-2's to the folks?

23 A. I haven't gotten mine yet.

24 Q. Is it your understanding they are supposed to be
25 doing that?

1 A. Yes.

2 Q. That was a bad question. Is it your understanding
3 they are going to be doing that?

4 A. Well, I don't know.

5 Q. Okay. There is -- you understand the distinction.

6 A. Yes.

7 Q. Okay.

8 A. Yes. We all know they are supposed to.

9 Q. Okay. But you don't have an understanding or an
10 expectation one way or the other whether they are actually
11 going to do it.

12 A. I don't.

13 Q. Okay. So when did you first have contact with the
14 folks at Saint Pio?

15 A. I'm thinking it was December 9th.

16 Q. Tell me about that, please.

17 A. I believe I heard the sale date was the 7th. And I
18 believe it was a couple of days later that I heard about
19 that.

20 Q. Okay. How did you hear about that?

21 A. An attorney -- or a retired attorney in Mexico, Lou
22 Leonatti, called me. He had been called by Ryan Cole, the
23 owner of Platinum Health, and told him that Cliff Sullivan is
24 who we would be talking to about the hospital going forward.

25 Q. When Mr. Leonatti called you, was he calling as an

1 attorney or as --

2 A. No.

3 Q. -- an active citizen in Mexico?

4 A. Active citizen.

5 Q. Because he kind of wears two hats, at least, in the
6 Mexico business community.

7 A. Yeah. He's retired as an attorney. So he was an
8 active citizen, yes.

9 Q. Okay.

10 A. He's involved in the hospital matters.

11 Q. Did he provide you any other information then about
12 his contact with Mr. Cole and Mr. Sullivan?

13 A. He just -- he was going to -- he is part of the
14 Catholic Ministries. And he was going into that meeting.
15 And he gave me Cliff Sullivan's phone number, and suggested I
16 give him a call. So I did that that afternoon.

17 Q. You said something about Catholic charities. What
18 are you referring to there, please?

19 A. That's something Lou Leonatti was involved in. He
20 was going into a meeting --

21 Q. Okay.

22 A. -- which was why he couldn't be on the call with me
23 and Cliff.

24 Q. But the charities meeting was not associated with
25 the work at the hospitals.

1 A. No.

2 Q. Okay. Sorry about that. And so you called Mr.
3 Sullivan that day, is that right?

4 A. Yes.

5 Q. The number that you called -- was that a cell phone
6 or his business line?

7 A. I don't know that.

8 Q. Do you know what that number is?

9 A. I have it in my phone.

10 Q. Could you look for me?

11 A. 503-358-8875.

12 Q. Is that the only phone number that you have for Mr.
13 Sullivan?

14 A. Yes.

15 Q. Do you have an e-mail address for Mr. Sullivan?

16 A. I do.

17 Q. May I have that?

18 A. It's theinvestmentguy@gmail.com.

19 Q. Okay. So you called Mr. Sullivan on about December
20 9, 2022, correct?

21 A. Yes.

22 Q. And what did he tell you?

23 A. He said that he had been working with Ryan Cole,
24 and that he understood that our community had a day of
25 prayer. And he wanted to answer that prayer and get our

1 hospital reopened. And so he worked out an arrangement with
2 Ryan Cole, and they were going to work to get the hospital
3 reopened.

4 Q. Okay. Did he give you any information about the
5 nature of that arrangement?

6 A. He did not.

7 Q. Did he give you any indication whether or not his
8 organization was going to be accepting the liabilities from
9 Platinum?

10 A. He did not.

11 Q. Did you have any discussion with Mr. Sullivan about
12 the back owed payroll for the employees?

13 A. I don't think we got in that level with Mr.
14 Sullivan.

15 Q. Okay. How long did you speak with Mr. Sullivan
16 that day?

17 A. I would guess 30 minutes.

18 Q. Okay. Did you ever speak to Mr. Sullivan again?

19 A. Yes.

20 Q. How many times, roughly?

21 A. I would guess two or three times.

22 Q. Did you ever have any e-mail correspondence with
23 Mr. Sullivan?

24 A. Yes.

25 Q. Okay. What was the nature of that e-mail

1 correspondence?

2 A. I don't remember.

3 Q. Okay.

4 A. I just know I sent him some.

5 Q. Okay. And were you sending him information similar
6 to what we talked about with Pasture or was it some other --

7 A. I really don't remember.

8 Q. Did you ever use your NobleHC.org e-mail for
9 anything other than work?

10 A. Probably could have. You know, I don't know.

11 Q. Okay.

12 A. I mean I wouldn't do it intentionally and
13 routinely. But --

14 Q. Maybe an accidental e-mail here and there. But
15 it's not one that you used for a lot of personal stuff,
16 correct?

17 A. Correct. It was the one I was in most often. And
18 so my friends -- if they needed to get me -- they would send
19 an e-mail there just so I would see it, if it was important.
20 It was on my business card as well. So everybody used it.

21 Q. Okay.

22 A. Yeah, my church used that one.

23 Q. Okay. Let's go back to Pasture Medical for just a
24 moment. I realized I skipped over some things.

25 Did you ever discuss the unpaid payroll and

1 **employee benefits with the folks at Pasture Medical?**

2 A. Yes.

3 **Q. Who did you talk to about that?**

4 A. Kalman. He asked me what I thought the total -- I
5 think it was Kalman -- he asked me what the total -- it could
6 have been Gary. Because this is -- as I'm playing it in my
7 head it's more of a question Gary would ask was what the
8 total of the payroll was. So I'm not remembering who I
9 talked to. But I remember telling him I thought it was
10 around 2.3 million dollars.

11 **Q. What was whoever you were talking to's response to**
12 **that?**

13 A. I think it was Kalman. Oh.

14 **Q. Other than giving the number, did you give any**
15 **other information about that figure?**

16 A. No.

17 **Q. How did you come to the figure of 2.3 million?**

18 A. Somewhere in the middle of all of this as I was
19 trying to put together what the total debts of the hospital
20 was, I had added up the payrolls. And so I didn't go back
21 and look at it. So I was quoting it from memory. And so
22 that's what I think it was. I still haven't gone back and
23 looked that up.

24 **Q. So you have not --**

25 A. I can't remember if that is the total. Because,

1 you know, Noble missed payroll. And Platinum missed payroll.
2 So, I don't know if that's the combined or if that was Noble.
3 I really don't know.

4 Q. Is it your belief that the information necessary to
5 figure that out is on the purple flash drive that you brought
6 with us today?

7 A. I think so.

8 Q. Okay. Is it your understanding that the
9 information on the purple flash drive includes the payroll
10 from both Noble and Platinum?

11 A. I do believe that.

12 Q. Are they separated or is it all kind of together?

13 A. I believe there is a folder for Noble and a folder
14 for Platinum.

15 Q. And eventually I will ask you to look at it. So
16 I'm not just asking you these weird conceptual questions.

17 A. And I think there is one folder that has time --
18 like time. That's why I think there is so many files is
19 because there is a lot of time card things. But I'm not
20 positive.

21 Q. Okay.

22 A. But that's what I think.

23 Q. I deal with that sort of thing pretty frequently.
24 It won't take me too long to dive through it when we take a
25 break?

1 THE VIDEOGRAPHER: You want to take a break?

2 MR. WERTS: No. I meant when we do.

3 THE VIDEOGRAPHER: Okay.

4 Q. (By Mr. Werts) The 2.3 million dollar number that
5 you were discussing -- was it you -- or were you intending
6 that to be a payroll number or a payroll and missed benefit
7 payments? Or do you know?

8 A. I don't remember.

9 Q. Okay. Because there is like kind of two different
10 buckets, right?

11 A. Sure.

12 Q. So when you were working with Pasture Medical were
13 there any submissions made to any licensing entities for the
14 hospitals?

15 A. No.

16 Q. Were there any submissions made to any governmental
17 entities during the Pasture Medical time period?

18 A. By me?

19 Q. Yes.

20 A. No.

21 Q. Are you aware of anyone associated with Pasture
22 Medical or the hospitals other than you making any
23 submissions to any governmental entities during that time?

24 A. No.

25 Q. The same series of questions dealing with Saint

1 **Pio.**

2 A. Saint Pio did apply for another extension of the
3 license -- of the suspension of the license. And they were
4 denied. And that would have been on December 20th.

5 **Q. Do you know what all information was submitted in**
6 **that application for extension?**

7 A. I do not. I didn't see it.

8 **Q. Okay. Do you know who made that submission?**

9 A. I think it was Cliff Sullivan.

10 **Q. Okay. Did you ever speak with anyone else at Saint**
11 **Pio besides Cliff Sullivan?**

12 A. No.

13 MR. WERTS: All right. We have been going about an
14 hour. Let's take a short break if we could.

15 THE WITNESS: Okay.

16 THE VIDEOGRAPHER: The time is 9:53 a.m. We're off
17 the record.

18 (OFF THE RECORD.)

19 THE VIDEOGRAPHER: The time is 10:22 a.m. We're
20 back on the record.

21 MR. WERTS: All right. Back on the record after a
22 short break.

23 THE VIDEOGRAPHER: The time is 10:23 a.m. We're
24 back on the record.

25 **Q. (By Mr. Werts) Okay. We're back on the record**

1 after a short break and making copies of the thumb drive. Do
2 you still have that thumb drive?

3 A. Do you need it?

4 Q. I was going to give it to J.D. to keep as the
5 official record. If that's okay.

6 A. Oh, that's right. I did make it for you.

7 Q. And then we have retained a copy of this on our
8 system upstairs, and then burned a thumb drive to provide to
9 counsel. There is roughly 3,100 files in total on it. So
10 there is actually quite a bit of content on the thumb drive.
11 Starting with what you did -- and I don't want you to sit
12 down here too long. We can look at it and refer to it later.

13 Okay. So let's talk a little bit about the folks
14 at Pasture Medical. Did Mr. Greenstein or Mr. Groner ever
15 come to Missouri?

16 A. No.

17 Q. Did they ever --

18 A. I guess I should say not to my knowledge.

19 Q. Okay. And that's a fair distinction.

20 A. Yeah.

21 Q. Did they ever submit any filings with either
22 Audrain or Callaway County or the cities of Mexico or Fulton?

23 A. Not that I'm aware of.

24 Q. Do you know if they ever made any filings related
25 to the employee retention tax credit or the other federal

1 **benefits that you were talking about earlier?**

2 A. I don't know. I gave them the information. But I
3 don't know what they did with it.

4 Q. Okay. And you indicated that Mr. Sullivan
5 submitted an application to extend the suspended license for
6 both hospitals or just one of them?

7 A. Both.

8 Q. And that was submitted to the Missouri State
9 Department of Health and Social Services?

10 A. Yes.

11 Q. Did Mr. Sullivan ever come to Missouri?

12 A. Not to my knowledge.

13 Q. You had a number of phone calls with him, correct?

14 A. Yes.

15 Q. Do you know whether Mr. Sullivan ever made any
16 submissions to the city or county governments?

17 A. Not to my knowledge.

18 Q. And so you became contracted with Pasture Medical
19 around the end of December 2022, correct?

20 A. Yes.

21 Q. At that time were you employed by Mr. Sullivan's
22 group?

23 A. No.

24 Q. Were you -- did you have any sort of relationship
25 with Mr. Sullivan's group at that time?

1 A. No.

2 Q. Were you ever contracted with Mr. Sullivan?

3 A. No.

4 Q. Did you ever provide any information to Mr.
5 Sullivan?

6 A. Yes.

7 Q. And we have talked about some of that. Have we
8 talked about all of the information that you provided to Mr.
9 Sullivan related to the hospitals?

10 A. I don't remember what I sent to him. I don't know
11 what questions he asked.

12 Q. It would be in that e-mail account though if we
13 wanted to look that up, correct?

14 A. Yes.

15 Q. When were you last employed?

16 A. I got an e-mail from Platinum on September 9th
17 terminating my employment.

18 Q. When did you begin with Platinum?

19 A. My first pay from them was in May. So I believe
20 they bought the hospital April 20th. So, I would have been
21 employed with them at that point.

22 Q. Did you continue to have access to the hospitals
23 after your employment ended on September 9, 2022?

24 A. Yes.

25 Q. How so?

1 A. So they -- we had a walk-in clinic that was still
2 going. Because after they terminated the employees, they
3 unterminated the clinic employees because they realized you
4 can't just drop patients at 4:30 on Friday afternoon. So,
5 the walk-in clinic was still operational. And we did have
6 staff continuing to show up. And so I showed up for them.

7 **Q. Okay. Did the folks at Platinum know you were**
8 **still showing up?**

9 A. Yes.

10 **Q. They were okay with it?**

11 A. Yes.

12 **Q. They just weren't paying you, right?**

13 A. They actually told me they would unterminate me,
14 too. But I said that's okay. I mean unterminate me and not
15 pay me. I just said I would rather not be representing you
16 anymore even though I'm still showing up. I was representing
17 the people. The employees that were there and the community
18 that needed health care. It was a really strange situation.

19 **Q. That's a good adjective. Okay. So, when you**
20 **started with Platinum in April of 2022 what was the name of**
21 **the entity that was your employer?**

22 A. Platinum Neighbors.

23 **Q. Is that Platinum Neighbors, Inc.?**

24 A. I don't know for sure.

25 **Q. Were you ever employed by any other Platinum**

1 **entity?**

2 A. At some point we were called Platinum Health
3 Services -- or Platinum Health Systems. And they got us the
4 e-mail address with that on it. But they purchased Noble
5 Health. And so then we started getting our paychecks from
6 Noble Health. And we got two W-2's from them. One from
7 Platinum Neighbors and one from Noble Health representing --
8 I think we had three paychecks on Platinum Neighbors and four
9 on Platinum Health -- or Noble Health. Excuse me. Noble
10 Health.

11 **Q. Were you ever employed by any other entity besides**
12 **Platinum Neighbors, Inc., and Platinum Health Systems?**

13 A. During that time?

14 **Q. Ever.**

15 A. Well, from January through March it was Noble
16 People.

17 **Q. Okay. And we'll get to the Noble folks. I just**
18 **want to lock in on the Platinum time period.**

19 A. Oh, okay. Yes. That's all.

20 **Q. Okay. And who was your main contact with Platinum?**

21 A. Cory Countryman. He was the President of Noble --
22 of Platinum Health Systems.

23 **Q. Where was he based out of?**

24 A. Wylie, Texas.

25 **Q. Did he ever come to Missouri?**

1 A. Yes.

2 Q. How many times?

3 A. I would guess ten.

4 Q. How often would you visit with Mr. Countryman?

5 A. My guess is daily. But either through phone or
6 e-mail.

7 Q. A lot.

8 A. Yeah. Yeah. I mean we were trying to get the
9 hospital reopened. So there was a lot of communication.

10 Q. So, daily or near daily. Sometimes multiple times
11 a day.

12 A. Sure.

13 Q. Maybe skip a day.

14 A. Right.

15 Q. But I'm not going to hold that against you.

16 A. Right.

17 Q. Did you typically visit by phone, Zoom, some other
18 way?

19 A. Phone.

20 Q. Do you know what phone number you usually contacted
21 Mr. Countryman at?

22 A. 214-502-7077.

23 Q. Do you have an e-mail for Mr. Countryman?

24 A. From what I'm seeing here, it's not the one that
25 sounds familiar. I have c.countryman@platinumhealthsys.org.

1 That one does seem familiar. There is another one here
2 that's called cory@platiniumhealthinc.com. I don't remember
3 using that one though.

4 Q. And is it Cory with an E or C-o-r-y?

5 A. C-o-r-y. The one I believe I used most often was
6 c.countryman@platinumhealthsys.org.

7 Q. Did you ever talk with Mr. Countryman about the
8 unpaid payrolls?

9 A. Yes.

10 Q. Tell me about that.

11 A. The first meeting that he had when he came to the
12 hospital would have been -- I believe we closed on a Friday.
13 And I believe it was the next Monday the first time that Cory
14 showed up. And I gave him the tour of the hospital. And he
15 called Ryan Cole and said we definitely want this hospital.
16 The employees are still all here. It's move in -- I mean we
17 could open it up immediately.

18 And so then we sat and talked about that there were
19 three missed payrolls that we needed to get taken care of.
20 And I was having -- so that would have been still like at the
21 very end of March. And on March 31st or April 1st -- I don't
22 remember exactly which day it was -- I know we furloughed
23 people as of April 1st. So I sort of feel like it was March
24 31st when we had the employee meeting in the cafeteria. And
25 that would have been on a Thursday, I believe. And Cory

1 Countryman came and he said to the employees, I know you all
2 need your back pay. And that's going to be our number one
3 priority.

4 And then we talked a lot about -- as Platinum
5 became our employer we had to get the people who were still
6 working new employment packets with W-9's and all the I-9
7 information because all the previous information was
8 electronically in ADP. And so we didn't have access to it
9 anymore. And before Platinum could pay us, they needed to
10 get all that in their system. So we got the people that were
11 currently working enrolled in Platinum's payroll system. And
12 then they began paying us through that from Texas.

13 We talked a lot about, you know, when are we going
14 to pay the April 1st payroll? The very first missed one.
15 And we actually loaded that into their system in Texas. And
16 if I remember it was -- we had e-mailed the employees and
17 said you can get your pay on January 5th, I think. We were
18 closed for the holidays. So it could have been the 6th. I
19 don't know. And then they didn't get the funding they were
20 expecting. And so we never got to start paying the back pay.

21 **Q. Okay. And so when we're talking about the April**
22 **1st missed payroll that -- you said that was loaded in for**
23 **payment in January. January of what year?**

24 **A. I meant July.**

25 **Q. Oh, okay. That makes more sense to me.**

1 A. Okay. I'm sorry. I meant July. Because it was
2 the 4th of July holiday was in the middle. I just remember
3 we were trying to get it done before the holiday. And they
4 didn't have the money. But they were sure the money was
5 going to be there by the time we got back from the holidays.
6 We told people to come pick their checks up whatever day that
7 was that we got back. But then we weren't able to distribute
8 them.

9 **Q. Okay.**

10 A. I mean they never even got to us. Platinum paid us
11 all the time with a paper check.

12 **Q. Okay.**

13 A. And so we either had to either Fed Ex it from
14 Texas. Or Cory Countryman would deliver it when he would
15 come.

16 **Q. Okay. Sometimes Mr. Countryman would bring the**
17 **checks to the hospital for distribution?**

18 A. Yes.

19 **Q. Other than that initial meeting, did you ever have**
20 **any further discussions with Mr. Countryman about the unpaid**
21 **payroll and benefits?**

22 A. I mean I can't tell you exactly when. I just know
23 we talked about it a lot.

24 **Q. Okay.**

25 A. It was always foremost, you know, back in the

1 beginning, because he had made that statement in front of all
2 of the employees. Everyone was expecting it to be soon. And
3 so we kept talking about it.

4 **Q. In these follow-up conversations, what would he say**
5 **about that?**

6 A. We are trying to get the money. He said they were
7 trying to refinance both of the hospitals. He also said that
8 he had -- the day that they signed the ownership paperwork,
9 that he drove to Kansas City expecting to be put on to the
10 Central Bank account so that they could pay the payroll --
11 use the funds that were in Central Bank to pay the payroll.
12 But I wasn't there. So I don't know exactly what happened.
13 But he did not get access to the funds that were in the
14 Central Bank account.

15 **Q. And was that a Central Bank of Kansas City?**

16 A. It was in Lee's Summit. I think it's called
17 Central Bank of the Midwest.

18 **Q. Central Bank's naming system makes sense on the**
19 **work chart. But basically that's the only place. So we can**
20 **figure that out. But it was the Lee's Summit branch he was**
21 **going to?**

22 A. I believe. I mean that's what I believe.

23 **Q. Okay.**

24 A. I don't really know for sure.

25 **Q. That's a general rule throughout this.**

1 A. Yeah.

2 Q. Like we said, all I can do is kind of hope to learn
3 what you know. Which is a lot.

4 A. Yeah.

5 Q. So, we're talking about banking. Did Platinum have
6 any other banking relationships after they took over in April
7 of 2022?

8 A. Yes. Since they couldn't -- Central Bank of the
9 Midwest did not want to work with them. And so they opened
10 up an account at the Bank of OZK. I don't know much about
11 that. I don't know where it is or anything.

12 Q. Is that a Missouri bank?

13 A. I don't know.

14 Q. And it's not Bank of Ozark. It's Bank of OZK.

15 A. That's how it was referenced when they would say
16 for opening an account at the Bank of OZK.

17 Q. Did you ever see any checks drawn on that bank?

18 A. I did not look at where my paychecks came from.
19 Like I said, they were all paper checks. But I did not see
20 where they came from.

21 Q. Do you still have any of those paychecks?

22 A. I only have the stub.

23 Q. But you still have the stubs for at least some of
24 them?

25 A. I do. I think the last one is what I have.

1 Q. Any other banks besides the Bank of OZK associated
2 with Platinum that you know of?

3 A. That's the only one I know of.

4 Q. Okay. To your knowledge did Saint Pio establish a
5 bank in Missouri anywhere that you're aware of?

6 A. Not to my knowledge.

7 Q. What about Pasture Medical?

8 A. I don't -- not to my knowledge.

9 Q. When Mr. Countryman would come to Missouri did
10 anyone else from Platinum come with him?

11 A. Melissa Upshaw.

12 Q. Anyone else?

13 A. Melissa came twice, I think. And then one time
14 Ryan Cole, Molly -- Molly was the Controller. I'm not
15 remembering her last name right now. And another Melissa.
16 I'm not remembering her last name either. But they came up
17 as a group and toured the facility. They met with some of
18 the -- I know we went to a clinic and met with the clinic
19 staff at the internal medicine clinic. I believe we went to
20 the Fulton Hospital and the Auxvasse clinic. And then I
21 believe that they came back to Mexico, and we had a meeting
22 with the medical staff. And that would have been their first
23 time to meet Ryan Cole. And that was May 26th.

24 Q. When that group of four folks -- Melissa Upshaw,
25 Ryan Cole, Molly the Controller and the other Melissa -- I

1 don't know the name -- but we'll go with it -- was that a one
2 day trip while they were here or were they here multiple
3 days?

4 A. They did spend the night in Columbia. So I think
5 they flew in, spent the night, came to Mexico and Fulton, and
6 then back to Columbia, and then flew out the next morning, is
7 what I believe happened.

8 Q. Did you see them on the 27th at all?

9 A. No.

10 Q. Did you talk with any of them on the 27th?

11 A. I don't think so. Because I think that was their
12 travel day back.

13 Q. Was this trip on May 26, 2022 the only time that
14 you ever met Melissa Upshaw?

15 A. No, I think she -- I know that I did a different
16 meeting with her and one of the doctors in Montgomery City --
17 it was just her.

18 Q. Okay.

19 A. So I can't remember if she stayed and came back on
20 the 27th, or if that was a different trip that she made.

21 Q. Okay.

22 A. But I do remember just being in that meeting with
23 her. And it was just me and her and him.

24 Q. Okay. And was this a business meeting of some
25 sort?

1 A. Yes. She was meeting with that doctor trying to
2 retain him, and telling him that they were working to get the
3 back pay done as soon as possible.

4 **Q. Okay. When you were visiting with Ryan Cole during**
5 **that meeting did you discuss the back pay issue with him**
6 **while he was in Missouri?**

7 A. Yes. And while we were at the internal medicine
8 clinic he said it would all be paid within the next 30 days.
9 And then we came and toured the hospital and every employee
10 group -- you know, we went to the accounting department, and
11 Cory Countryman said hey, you know, we're going to have the
12 back pay done within 30 days. We went to the walk-in clinic
13 -- we're going to have the back pay done in 30 days.

14 **Q. And that never happened, correct?**

15 A. Right. You know, the 30 days would have been June
16 26th. And we were pushing to say you said 30 days. This is
17 it. And then it was the 4th of July. And they were trying
18 to meet that deadline that Ryan had verbalized. But they
19 never got the money to do it.

20 **Q. Okay.**

21 A. So we never got the checks.

22 **Q. Okay. Did you ever meet Ryan Cole in person other**
23 **than this trip?**

24 A. No.

25 **Q. Okay. How often did you visit with Mr. Cole during**

1 **the Platinum tenure?**

2 A. That was the only time.

3 **Q. Okay.**

4 A. I tried to call him a couple of times. But he
5 would forward my voicemail to Cory and have Cory call me.

6 **Q. Okay. What about Molly? Did you ever meet her**
7 **anytime other than the May 26th trip?**

8 A. No.

9 **Q. What about the other Melissa?**

10 A. No. That was the only time.

11 **Q. Did you have a sense of what the other Melissa's**
12 **role with the company was?**

13 A. She was -- they had other clinics or medi-spas or
14 something down in Texas. And I think she was over them.

15 **Q. Okay.**

16 A. I'm not for sure. But that's what I think. And
17 when Melissa Upshaw took a vacation, then that Melissa helped
18 me get some supplies I needed.

19 **Q. Okay.**

20 A. So, you know, she helped with operations.

21 **Q. Okay. Did that Melissa ever make any statements**
22 **about the back owed payroll or the benefits?**

23 A. I don't think so.

24 **Q. What about Molly the Controller? Did you ever meet**
25 **her at anytime other than the May 26, 2020?**

1 A. Not in person.

2 Q. Did you ever speak with her other than that?

3 A. Yes.

4 Q. How often?

5 A. I didn't have a lot of conversations with her. But
6 she was in daily communications with our Controller and
7 accounting department, you know, getting payroll ready or
8 accounts payable information.

9 Q. Was she the person in charge of payroll?

10 A. Molly. Uh-huh.

11 Q. Who actually signed the checks that Mr. Countryman
12 was bringing?

13 A. Ryan Cole.

14 Q. How often -- or let me ask a better question. Did
15 you ever talk with Molly about the unpaid benefits and
16 payroll?

17 A. I don't think I talked to Molly about it. I think
18 I talked to Cory and Melissa about it.

19 Q. Okay.

20 A. Molly -- I mean she could have been on a phone call
21 that I was on. But I don't remember.

22 Q. Never was a specific conversation though.

23 A. No. My contacts as a CEO were really Cory and
24 Melissa. And Molly talked more with the accounting payroll
25 people.

1 Q. Okay.

2 A. They were in a different building.

3 Q. Did the Platinum folks ever submit any license or
4 paperwork to the State of Missouri?

5 A. Yes.

6 Q. Tell me about that, please.

7 A. So, around June 20th was the first time they
8 submitted the change in ownership. And they requested for an
9 extension to the suspension due to the change in ownership.
10 So, the State granted another 90 days.

11 Q. Were those the only such submissions?

12 A. Then in -- so that got us to -- let's see -- the
13 March to June. June to September. And so on or around
14 September 20th they submitted another request for an
15 extension to the suspension due to the need for construction
16 at both facilities. And those were approved.

17 Q. Okay. Anything else?

18 A. Those are the only ones that I'm aware of.

19 Q. Do you know whether a change of ownership was ever
20 filed with regard to Saint Pio?

21 A. I don't know.

22 Q. Do you know whether a change of ownership was ever
23 filed with regard to Pasture Medical?

24 A. I don't know.

25 Q. Do you know whether or not Platinum is still the

1 owner of record of those facilities with the Department of
2 Health and Senior Services?

3 A. I believe Saint Pio -- Cliff -- when he filed the
4 request for the extension, he filed a change of ownership
5 with the State. I do believe that.

6 Q. Okay.

7 A. Because I think I remember seeing something that
8 said the change of ownership was approved, but the extension
9 was denied.

10 Q. Did you ever receive any payments from Mr. Sullivan
11 or his group while you worked?

12 A. No.

13 Q. To your knowledge did anyone associated with the
14 hospital receive any payments from Mr. Sullivan?

15 A. No. To my knowledge.

16 Q. And you indicated you have received some payments
17 from the folks at Pasture Medical, correct?

18 A. Yes.

19 Q. Mechanically how did they pay you?

20 A. The first check I got -- so, part of my situation
21 is as Noble was running out of money and we were trying to
22 still run the hospital, I paid for things on my personal
23 credit card. The total around \$30,000. And so I talked to
24 Pasture medical about that. And I said, you know, I don't
25 have to have a contract with you. There is no payroll

1 involved. If you are the -- you know, if you currently have
2 responsibility for these liabilities, you can just pay me.
3 And so they did send me a check for \$5,000 in December -- at
4 the end of December.

5 After that when I was working for them hourly, they
6 have been electronically depositing ACH into my account.

7 Q. Do you know who signed the paper check for the
8 \$5,000?

9 A. Gary Greenstein.

10 Q. Do you know what bank it was drawn on?

11 A. I don't.

12 Q. Do you still have a copy of the check?

13 A. No.

14 Q. But you did deposit it, correct?

15 A. I did deposit it.

16 Q. It cleared? It's a fair question. And then the
17 rest of your payments have been electronic?

18 A. Yes.

19 Q. Do you know what bank those were drawn from?

20 A. I don't.

21 Q. Okay. Do you know what system they were using to
22 send those -- like was it a QuickBooks electronic system or
23 Square?

24 A. I don't know.

25 Q. It just showed up?

1 A. It just showed up.

2 Q. Okay. Had you given them like direct deposit
3 information?

4 A. Yes.

5 Q. Did you ever receive any other funds from the folks
6 at Platinum other than the paper checks that Ryan Cole
7 signed?

8 A. No.

9 Q. How many times did Mr. Countryman deliver checks
10 that had been signed by Ryan Cole to Missouri for
11 distribution?

12 A. Where he personally delivered them? I would say
13 probably four.

14 Q. And then the other three times were --

15 A. In Fed Ex.

16 Q. Mr. Cole signed each of those checks though?

17 A. As far as I know.

18 Q. You didn't look at each of them.

19 A. Right.

20 Q. But the ones you saw.

21 A. Yes.

22 Q. Roughly how many checks were in each of those
23 bundles?

24 A. So, probably the early ones, 100. And the last one
25 in August 5th, 200. Because we were hiring people to get the

1 hospital back open.

2 Q. As you were kind of getting operations going under
3 Platinum, where was the money coming from?

4 A. I don't know.

5 Q. Okay. And that was not a good question. And then
6 so we will get to where Platinum was getting money from in a
7 moment. Was Platinum providing the funds to you and the
8 other people to be able to pay bills and do things?

9 A. No, they paid them from Texas. Molly.

10 Q. During that time period what was your job title
11 with Platinum?

12 A. So, they never gave me another contract. They just
13 kept paying me the same thing that Noble was paying me as
14 CEO.

15 Q. And you were CEO of what?

16 A. Of Audrain Community Hospital.

17 Q. When would you say that stopped being your job
18 title?

19 A. I would say September 9th. I became the volunteer
20 front desk receptionist after that.

21 Q. My father always told me the only two positions at
22 any organization were at the very top and the very bottom.

23 A. There you go.

24 Q. So you spanned the gambit on that.

25 A. Well, I learned a lot about the building.

1 **Q. What do you mean by that?**

2 A. Just as, you know, things needed to be -- the heat
3 and water -- and you know, in Mexico it's a small community.
4 And we can't watch it just deteriorate. So when things would
5 happen, we would just go clean it up.

6 **Q. And so as the CEO of Audrain Community Hospital,**
7 **did you have the ability to sign contracts on behalf of**
8 **Platinum?**

9 A. Platinum, I don't believe I signed any. I think
10 Cory signed them.

11 **Q. Okay. Did you have the ability to hire employees?**

12 A. I was able to hire the ones back. So like Cory
13 would say -- I would tell him, you know, we need to get -- if
14 we're going to get radiology all up and going, we need to get
15 our machines back in compliance. And so I can't do that. I
16 need the radiology people. And so he would say okay, bring
17 them back.

18 **Q. Okay.**

19 A. That kind of thing.

20 **Q. And then would you be the one that would reach out**
21 **to the radiology folks to say you're hired again and work out**
22 **whatever agreements you were going to have?**

23 A. Either me or the chief nursing officer. I think
24 she probably did the radiology ones.

25 **Q. Okay.**

1 A. I did the physical therapy. Pharmacy. Because we
2 had the clinics open, a lot of the registration staff were
3 working in the clinics. People were leaving. And nurses
4 from the hospital that wanted to work were working in the
5 clinics. That type of thing.

6 **Q. What about dealing with vendors?**

7 A. I did.

8 **Q. Okay. And you had the ability to enter into vendor**
9 **agreements and negotiate on behalf of Platinum?**

10 A. I don't remember doing any for Platinum. Because
11 we never got open. I was in constant communication with the
12 ones that we owed money to under Noble, who Platinum was
13 working payment arrangements with. And so Melissa Upshaw was
14 the one that would do the payment arrangements.

15 So I don't think that I did any contracts under
16 Platinum. To my knowledge anyway.

17 **Q. Did you do any contracts under either Saint Pio or**
18 **Pasture Medical?**

19 A. No.

20 **Q. When you were talking with the folks at Platinum**
21 **you said that you used that NobleHC e-mail account that we**
22 **talked about some, correct?**

23 A. Yes.

24 **Q. Did you also use either your g-mail or Yahoo**
25 **accounts to communicate with those folks?**

1 A. Not that I recall. Because they came in so close
2 after Noble -- and I was using that one all the time. Then
3 they created the Platinum one, and I switched to that one.
4 So, I think I was just using those two with Platinum.

5 Q. Okay. Good. That makes my life easier.

6 A. Yeah.

7 Q. And so not that's it's a major concern about. But
8 it does.

9 A. Yeah.

10 Q. When did you first get access to the Platinum
11 e-mail account?

12 A. I'm going to guess June-ish. June of 2022.

13 Q. When did you last have access to it?

14 A. I think about October.

15 Q. When you would access the Platinum e-mail account
16 would you use Microsoft Outlook ever?

17 A. Yes. So they are still sitting there on my Outlook
18 thing. But I can't use it. It says contact your server
19 administrator.

20 Q. Okay. So you still have a copy of all of those
21 sent and received items. It just doesn't work anymore.

22 A. Correct.

23 Q. Is that a copy at your home or is that at the
24 hospital?

25 A. I have it at home.

1 Q. And do you also have a copy of your Noble Health
2 Care e-mail at your home?

3 A. Yes.

4 Q. Did either of those accounts ever have any sort of
5 automatic archive or deletion protocol where they would get
6 rid of old e-mails after a certain time period?

7 A. Not that I'm aware of.

8 Q. Have you ever looked for an old e-mail and not been
9 able to find it?

10 A. Not that I'm aware of. When I do it on my phone,
11 all the time, because I guess it only keeps so much. But on
12 the computer I have a better -- so I don't think there has
13 been any that I have looked for that I couldn't find it.

14 Q. Did you use any electronic communication appliances
15 or applications when dealing with the folks at Platinum?

16 A. No.

17 Q. You didn't use any of the Teams or What's App or
18 Slack or any those other programs?

19 A. We may have used Teams or Zoom a few times.
20 Because, yeah, I do remember seeing Melissa Upshaw on my
21 computer. So we would had to have used something like that.

22 Q. When you were talking about Teams, were you using
23 the chat function, the video call function, or both?

24 A. Probably the video.

25 Q. Did you ever use the chat function with Teams?

1 A. Not with Platinum. With Noble it was just a very
2 little bit.

3 **Q. Anyone else associated with Platinum that you ever**
4 **had dealings with during this time in the summer of 2022?**

5 A. Brandon Deiters.

6 **Q. Who is Brandon Deiters?**

7 A. I don't know his exact title. But he was the one
8 that set up the g-mail account -- the Platinumhealthsys.org.
9 And he was the one that got the NobleHC domain from Noble to
10 Platinum. So I don't know what his title was.

11 (Cell Phone Rings.)

12 **Q. Do you need to take that?**

13 A. No. It's okay. It's rescheduling the lunch.

14 **Q. Okay. Other than some IT support, what else did**
15 **Brandon Deiters do?**

16 A. So any -- he set up the meeting with John Brown --
17 I think was the attorney that I talked to. And then he
18 responded to my letter and said that they had sold. And he
19 said the new entity took all the legal liabilities.

20 **Q. Anything else?**

21 A. That's all I can remember.

22 **Q. Okay. And so when Mr. Deiters responded to your**
23 **letter -- we'll ask more in a moment -- was that by phone or**
24 **by e-mail?**

25 A. By e-mail.

1 Q. Do you know where Mr. Deiters was located?

2 A. I'm guessing in the office of Platinum in Wylie,
3 Texas.

4 Q. Did he have an office here in Missouri for a time
5 during the summer of 2022?

6 A. He did not.

7 Q. Did Platinum have like a house over by the Old
8 Hawthorne Country Club?

9 A. So Noble had a lease there. And when Platinum took
10 over, Tom Carter gave Cory Countryman the keys to that. And
11 that's where Cory would stay when he would come.

12 Q. Was the house ever used for anything else?

13 A. I don't know. I never saw it.

14 Q. Okay. I guess that's the question. Were you ever
15 there?

16 A. No.

17 Q. The reason I ask is that the Missouri Secretary of
18 State -- Brandon Deiters was at one time listed as the
19 Registered Agent for certain Platinum entities with that
20 address over at that house in Old Hawthorne. And so have you
21 ever heard of that before?

22 A. I saw his name associated with that address in some
23 of the mail that has come in. But to my knowledge he never
24 came up here.

25 Q. Okay. So you never saw Mr. Deiters in Missouri?

1 A. No.

2 MR. WERTS: Okay. All right. Let's mark Exhibit
3 5.

4 (Exhibit 5 was marked for the purpose of
5 identification herein.)

6 Q. (By Mr. Werts) All right. I have handed you now
7 what has been marked as Deposition Exhibit 5. Do you
8 recognize that?

9 A. Yes.

10 Q. All right. That's one of those dumb lawyer
11 questions, I know. Tell me what it is, please.

12 A. It's the letter that I sent to the current and
13 former owners of Noble Health asking them for legal counsel.

14 Q. Okay. And you sent this by Certified Mail, is that
15 right?

16 A. Yes.

17 Q. Did you also send it by e-mail or just Certified
18 Mail?

19 A. I think just Certified Mail.

20 Q. Okay.

21 A. I don't know that I have all their e-mails.

22 Q. Okay. And you said that you -- we talked about the
23 response from Mr. Deiters. Did you receive any other
24 response from this?

25 A. Mr. Solomon called me and said that he does not

1 have legal counsel either. And that he just couldn't afford
2 it.

3 **Q. Did he say anything else on that call?**

4 A. He asked me what the current -- you know, what
5 Pasture is doing. I think at the time that was at the
6 corporate office staff had filed something with the Kansas
7 Department of Labor. And it was that week that they were
8 having their phone calls or whatever to respond to those
9 situations. And so I just replied to him that I don't know
10 what they are doing. You know.

11 **Q. Okay. And so the address that you have on here for**
12 **Pasture is in Wyoming.**

13 A. Yes.

14 **Q. And you talked about that somewhere in New Jersey**
15 **is where you thought Mr. Groner was from. And Mr. Greenstein**
16 **was from New York. Why did you send this to Wyoming rather**
17 **than to the east companies?**

18 A. Lou Leonatti gave me that address. The county
19 loaned Noble Health money and had a promissory note that they
20 are -- I don't know what they are doing. I guess maybe -- I
21 don't know if they are filing a lien or a lawsuit or
22 something. Anyway. And he had gotten the Registered Agent's
23 address. And that was it.

24 **Q. Okay.**

25 A. So when I got this I went and said Lou, what do I

1 need to do?

2 Q. Okay. Don't tell me anything that he told you
3 about that. Because even though he's retired, he's still a
4 lawyer, so I don't want to hear that?

5 A. Yeah. And he said that -- he said I can't tell you
6 what to do with that.

7 Q. Okay.

8 A. But I can give you an address.

9 Q. Okay. That sounds like Lou. I actually know him
10 fairly well.

11 A. Yes.

12 Q. Okay. And then the address that you have for Ryan
13 Cole is a Dallas address. You have been talking about Wylie,
14 Texas. What is the distinction there?

15 A. So, I also got a notice from the Department of
16 Labor. And they had sent me a letter with these addresses of
17 everybody else on it. And so that's where I got those
18 addresses from.

19 Q. Okay.

20 A. Which it looked like they might have the right
21 address. I don't know.

22 Q. Okay.

23 A. And it worked. Because Brandon Deiters did
24 respond.

25 Q. Okay. And so William Solomon -- which entity or

1 entities was he related to?

2 A. Noble.

3 Q. What about Donald Peterson?

4 A. Noble.

5 Q. And Thomas Carter?

6 A. Noble.

7 Q. I'm just kind of handing around copies of what we
8 originally marked as Deposition Exhibit No. 2. And this was
9 dated April 20th. And you had talked about Platinum starting
10 to take over effective April 1, is that correct?

11 A. No. April 20th.

12 Q. April 20. Okay. I see. So March 31st is when the
13 decisions were made about furloughing employees. And they
14 were furloughed on April 1st.

15 A. Correct.

16 Q. And then the transfer was made on April 20th.

17 A. Correct.

18 Q. So, we have got four signatures on the first page
19 of Exhibit 2. Do you recognize each of those names?

20 A. I do.

21 Q. And so the first name is Jeremy Tasset. That's a
22 new name for us today. Who is that person?

23 A. He is with -- I met him when I went to the
24 corporate office in Leawood, Kansas. And so Jeremy Tasset --
25 I believe he's with Nueterra -- which must be NC Holdings. I

1 don't know. Or maybe that Noble Corporation Holdings. I
2 don't know.

3 Q. Prior to looking at Exhibit 2 were you familiar
4 with the entity NC Holdings, LLC?

5 A. No. I mean when I got this document is the first
6 time I saw that.

7 Q. Sure. And so Nueterra -- that is another new term
8 for us today. We'll come back to that. Do you know whether
9 or not that is actually Mr. Tasset's signature?

10 A. Oh, I don't know.

11 Q. Okay. The next name is Donald Peterson. That's
12 one of the names we saw, correct?

13 A. Correct.

14 Q. Do you know whether or not that is in fact Mr.
15 Peterson's signature?

16 A. I don't know.

17 Q. And I'll have the same questions for Mr. Carter and
18 Mr. Solomon. Do you recognize those as being their
19 signatures?

20 A. I really don't. I mean I have seen their
21 signatures before. But I don't have them memorized.

22 Q. Okay.

23 A. So I don't know.

24 Q. Fair enough. And when was the trip to Leawood,
25 Kansas that you're talking about to the corporate office?

1 A. So the time that I met Mr. Tasset would have been
2 in November of '21. I don't remember the date. I went up
3 there for a meeting, and I met him in the building.

4 **Q. Okay. Did he participate in the meeting?**

5 A. No.

6 **Q. What was the nature of the meeting that you were**
7 **having?**

8 A. We were talking about billing. And they had gotten
9 a consultant -- Noble had hired a consultant to review the
10 billing practices. And we were going through the power point
11 from that.

12 **Q. Okay. And was the corporate office that you were**
13 **at -- was that at Noble's corporate office or Nueterra's**
14 **corporate office?**

15 A. I think from what I believe is that Noble leased
16 space from Nueterra to have their corporate office there.

17 **Q. Had you heard of Nueterra before this meeting in**
18 **November of 2021?**

19 A. Yes. Because I had been to that building before in
20 May of 2021. I hired a new employee that was going to work
21 remote -- and she lived in Oklahoma -- so we met at that
22 building to go through orientation. And the name is on the
23 outside of the building.

24 **Q. Okay. So let's talk about the other three**
25 **gentlemen from Noble. What is your understanding of what**

1 **Donald Peterson's role was with Noble Health?**

2 A. So, he was the first person that contacted me. I
3 was in Iowa working and -- well, let me back that up. There
4 is a gentleman named Pat Klingler that worked for Noble in
5 business development. Pat was the first one to call me to
6 see if I was interested in the job. And then he set up a
7 call with me and Don Peterson.

8 **Q. Okay.**

9 A. And Don represented him as one of three owners of
10 the company. And that they were going to buy two hospitals
11 in Missouri. And the one in Mexico needed a CEO. And he
12 asked if I was interested. And I said yes. And then I
13 interviewed with them on December 28th of 2020.

14 **Q. When you say them -- did you interview with all**
15 **three of the shareholders?**

16 A. No, it was Don Peterson and Thomas Carter.

17 **Q. Where was that interview held?**

18 A. At the Aussie Outback restaurant in Mexico.

19 **Q. And at that time had they bought the hospitals yet,**
20 **or were they still thinking about it?**

21 A. So, in December of 2020 they had not bought the
22 Audrain Hospital. And I am not clear on when the Callaway
23 one happened. Because I was just focused on Audrain. So, it
24 didn't change ownership until March 16, 2021.

25 **Q. And who did they buy it from?**

1 A. SSM Healthcare in St. Louis.

2 Q. Did they buy both the Audrain Hospital and the
3 Callaway Hospital from SSM?

4 A. No.

5 Q. Who did they buy the Callaway Hospital from?

6 A. I don't know.

7 Q. Okay.

8 A. That happened prior to me -- or without me. I
9 don't know when.

10 Q. Okay.

11 A. I felt like when I got there in February they owned
12 it. But I don't know.

13 Q. Okay. And so you got to Audrain Medical Center in
14 February 2021, but Noble didn't actually buy them until March
15 of 2021.

16 A. Correct.

17 Q. So did you work for SSM for a period of time?

18 A. No.

19 Q. Kind of like a transition month?

20 A. Yes. So they put me on the Noble Corporate
21 payroll.

22 Q. Did they start paying you in February 2021?

23 A. Yes.

24 Q. When you started with Noble Corporate in February
25 of 2021 were they paying you by paper check or electronic

1 **deposit?**

2 A. I think they were always electronic.

3 **Q. Do you know what bank it was drawn out of?**

4 MR. STROMBERG: Could I just interject really
5 quick? And I apologize. When you're saying Noble Corporate
6 are you talking Noble Health Corporation? Or is that just
7 like the generic term with Noble Corporate like corporate
8 people? I just want some clarity for everybody here.

9 THE WITNESS: Yeah, I just knew that that was --
10 you know, we had -- at the end it was Audrain, Callaway and
11 Corporate. So when I refer to Corporate, that's the people
12 that worked at the Leawood office -- the corporate staff.
13 And that was -- they were on Humana Health Care. So I was on
14 Humana Health Care because I was brought on before the health
15 insurance for Audrain happened. That started April 1st. So
16 they just left me on the Corporate thing.

17 MR. STROMBERG: I'm sorry for derailing you there.

18 MR. WERTS: Oh, no.

19 THE WITNESS: It probably does matter. But I don't
20 really know. So --

21 **Q. (By Mr. Werts) And for now I'm just trying to kind**
22 **of block off the time. And then we will actually spend some**
23 **time drilling into this. It will be horrible. But we'll get**
24 **to that later. But for now just --**

25 A. It could be a bunch of I don't know's. But we'll

1 see.

2 Q. I almost assume it would be. You know, that
3 basically here to here is the reports listing out different
4 entities.

5 A. Okay.

6 Q. But it's not going to be horrible. These guys like
7 to pay filing fees with the Secretary of State.

8 Okay. So that's an interesting question. So you
9 were always getting paid electronically from the folks at
10 Noble's corporate office. Was that coming out of the Central
11 Bank account in Lee's Summit that we were talking about
12 earlier?

13 A. I don't know.

14 Q. Okay. Did that ever change? Where you were
15 getting paid from Noble?

16 A. Not to my knowledge.

17 Q. Okay. Now, I do want to talk about the entities a
18 little bit. We already looked at a document -- there is an
19 entity called Noble People, LLC. Have you ever seen that
20 name before?

21 A. Yes.

22 Q. So tell me about that. What is that?

23 A. So, to my knowledge that was a professional
24 employment organization created to employ all the people.
25 And by doing that for payroll, purposes we could have staff

1 that work at one or the other, and we were able to charge the
2 entity's general ledger for the hours. You know. But on the
3 payroll system you track that employee's over time in one
4 way. So, I agreed with that setup. And so everybody was
5 employed through Noble People.

6 Q. Okay. Including yourself?

7 A. Yes.

8 Q. Okay. And --

9 A. Yeah. My W-2 from 2021 came from Noble People.

10 Q. Okay. And do you have an understanding of who
11 owned Noble People?

12 A. So, I didn't have an understanding of that until
13 last week when I -- I found an application for an Iowa Works
14 grant for Noble People. And it had who owned Noble People.

15 Q. Okay. And who was that?

16 A. So it had the three owners. Don, Tom and Drew.
17 And then -- I may actually have that in the car.

18 Q. We're at a breaking point. You want to go look?

19 A. Yeah.

20 Q. Okay.

21 A. I mean I can do that. That was just the first time
22 I saw it. It was interesting.

23 MR. WERTS: All right. Let's take a break and go
24 look. And then -- let's go off the record first. He will
25 read a little thing.

1 THE VIDEOGRAPHER: The time is 11:30 a.m. We are
2 off the record.

3 (OFF THE RECORD.)

4 (Exhibit 6 was marked for the purpose of
5 identification herein.)

6 THE VIDEOGRAPHER: The time is 12:20 p.m. We're
7 back on the record.

8 Q. (By Mr. Werts) All right. We're back on the
9 record after a short break for lunch. And it's 12:20. I
10 think you indicated that we could try to get you into Fulton
11 before 4:30.

12 A. Correct.

13 Q. We'll try to make that happen. We also had just a
14 brief conversation before we went on about a supplemental
15 subpoena. And you would be okay with accepting service of
16 that by e-mail as opposed to personal service?

17 A. Yes.

18 Q. And that subpoena by way of preview will have some
19 specific documents that you have described that you have at
20 home -- but you don't have with you -- including electronic
21 documents and instructions on how to upload those.

22 MR. WERTS: We will serve notices of subpoena to
23 anybody that is entered on the case, and mail it to the other
24 entities as well for the addresses that we have. And there
25 will be a date on the subpoena asking you to upload -- if you

1 haven't heard from any of us.

2 Just to be fair to Matt's client -- he should have
3 the opportunity to object if they want to. Then we'll fight
4 about it. Then you will still have to do it. But they at
5 least get a chance to be heard. So we don't want to be
6 pulling fast ones on you. But that will probably be early
7 next week is when that e-mail will probably come.

8 Q. (By Mr. Werts) And so you brought us a new document
9 while we were out at lunch, which has been marked Exhibit 6.
10 I'm going to hand you that -- which is a photocopy of what
11 you brought. Is that correct that you brought Exhibit 6 to
12 us here today?

13 A. Yes.

14 Q. Tell me what this is.

15 A. So, in my studying for my new job for Economic
16 Development, I found that Missouri Works is one of the State
17 programs. And I was going to Google it, and my cursor was
18 actually in my e-mail, and I typed Missouri Works, and this
19 popped up.

20 Q. Okay.

21 A. And apparently I had gotten this by e-mail at some
22 point. And I saw what it was. And it was Noble People
23 applying for a Missouri Works grant. And it had information
24 on it that I don't remember ever seeing.

25 Q. Okay. And what information is that that you don't

1 **remember ever seeing?**

2 A. I didn't remember seeing who owned Noble People.

3 **Q. Okay.**

4 A. And so it says Tom Carter, William Solomon, Don
5 Peterson. NHC Stock Irrevocable Trust owns 16.1 percent.
6 And Value Health, LLC owns 46.7. And I had never heard of
7 Value Health.

8 **Q. Okay. Had you heard of NHC Stock Irrevocable**
9 **Trust?**

10 A. No. No.

11 **Q. Have you since learned anything about who either of**
12 **those two entities are?**

13 A. No, I have not.

14 **Q. Do you know whether Noble People got this grant?**

15 A. I don't think they did. So to my knowledge, no.

16 **Q. There is another name on here under Mr. Solomon's**
17 **name under contact information.**

18 A. Uh-huh.

19 **Q. And just so the record is clear, we were going**
20 **through a list of owners. You referred to William Andrew**
21 **Solomon as Drew earlier, is that correct?**

22 A. Correct.

23 **Q. So if you say Drew, you're talking about William**
24 **Solomon?**

25 A. Yes.

1 Q. Okay. There is another name -- Sophia Binder. Do
2 you recognize that name?

3 A. Yes.

4 Q. Tell me about that person.

5 A. She was the HC Director hired in the corporate
6 office. And Christy Smiley, the HR Manager, reported to
7 Sophia.

8 Q. And so if you turn to the second page of what has
9 been marked as Exhibit 6, it talks about the health insurance
10 company, Meritain --

11 A. Yes.

12 Q. -- Health. Are you familiar with that
13 organization?

14 A. Yes.

15 Q. Who is that?

16 A. They were the -- I guess the third-party
17 administrator for our self-funded health plan.

18 Q. And was that health plan -- did that cover the
19 employees both at Audrain and Callaway?

20 A. Yes.

21 Q. And all of the clinics?

22 A. Yes.

23 Q. And so it also has an employee count -- kind of a
24 big number -- of 351 across nine facilities. Do you see
25 that?

1 A. Yes.

2 Q. Do those numbers look correct to you for the total
3 number of employees at locations that we have been talking
4 about when we talk about the hospitals and the clinics?

5 A. Yes.

6 Q. Okay. Can you tell me what all nine of the
7 facilities were?

8 A. So we had two hospitals. Seven rural health
9 clinics. That's nine.

10 Q. Okay. And the two hospitals were Audrain Medical
11 Center and Callaway Community Hospital, right?

12 A. Yes.

13 Q. Can you tell me the names of the seven clinics?

14 A. Fulton Rural Health Clinic.

15 Q. Okay.

16 A. Montgomery City -- which under Noble it was called
17 Noble Health Montgomery City. Noble Health Wellsville, Noble
18 Health Perry, Noble Health Madison, and Noble Health Walk-in
19 Family Medicine and Walk-in Clinic.

20 Q. Okay.

21 A. Did I get them all?

22 Q. That didn't seem like seven.

23 A. Okay. Let me write them down.

24 Q. Okay.

25 A. All right. So we had the Noble -- the Fulton Rural

1 Health Clinic. To the best of my knowledge that's what that
2 was called. We had Noble Health Montgomery City, Noble
3 Health Wellsville, Noble Health Auxvasse, Noble Health Perry,
4 Noble Health Medicine in Mexico. And Noble Health Family
5 Medicine and Walk-in in Mexico.

6 Q. Got it. Okay. So we talked about when you were
7 hired you started in February until March. So -- and that
8 was March of 2021, correct?

9 A. Correct.

10 Q. When did Noble Health first fail to make premium
11 payments on any insurance plan?

12 A. So I'm not going to know the answer to that.

13 Q. Okay.

14 A. Because those payments came from the corporate
15 office.

16 Q. In Leawood?

17 A. In Leawood. So I don't know -- I don't know.

18 Q. Okay. And there is the Meritain Health Insurance.
19 Is that who those payments would have been made to? Or some
20 other insurer?

21 A. I'm not sure if Meritain only did the health
22 insurance. And so HUB International -- I do remember getting
23 e-mails from them. I don't remember the guy's name. But I
24 believe HUB was the broker, and Meritain was the third-party
25 administrator for the health. Then there was the dental, and

1 a vision, and a 401-K, and life insurance. So I think HUB
2 managed all of that under Noble in 2021.

3 Q. Okay. When did you first become aware that the
4 corporate office had missed payments on the employee benefits
5 program?

6 A. So, August -- Don Peterson sent an e-mail that had
7 I believe it was Meritain invoices on it. And he e-mailed it
8 to Drew and I and said, I hope you guys are taking care of
9 this. How I was going to take care of it, I don't know.
10 Because I didn't have any money. You know. But that was
11 what the e-mail said. I hope you're taking care of this.

12 Q. And that was in August of 2021?

13 A. Yes.

14 Q. And that would have been to your NobleHC.org
15 e-mail?

16 A. Yes.

17 Q. Okay. And so do you remember who the insurance
18 carrier was that Noble was working with on in 2021? Like you
19 said you had Humana. Who was the carrier they had?

20 A. So the corporate office had Humana.

21 Q. Right.

22 A. And then HUB International was the broker for
23 Meritain, which was the third-party administrator. So,
24 Meritain sent invoices for claims and administrative fees.
25 And I never really saw the -- I don't think I saw the dental

1 and vision and all that kind stuff.

2 Q. Okay.

3 A. I don't know who that went to.

4 Q. Okay. And was their actual insurance behind it or
5 was it a self-insurance fund?

6 A. May have been Principal. What was the question?

7 Q. I'm sorry. Was there as actual insurance policy or
8 was it a self-insurance fund that was being administered?

9 A. It was a self-insurance plan.

10 Q. And I think you mentioned that there was -- was
11 there insurance for the dental or was that also
12 self-insurance?

13 A. I think there was insurance. And I think it was
14 run through Principal.

15 Q. Okay. What about the vision?

16 A. And I think that maybe Principal did both of those.
17 But I'm not clear.

18 Q. Okay. What about the life insurance?

19 A. I know that was through a different company. I
20 believe it was the Hartford.

21 Q. What about the 401-K?

22 A. That was Principal.

23 Q. And so in August of 2021 there were concerns about
24 whether the health insurance premiums were being paid,
25 correct?

1 A. Yes.

2 Q. At some point is it true that health insurance
3 premiums were not being passed on and paid?

4 A. Yes.

5 Q. During that time period were health insurance
6 premiums still being withheld from the employees' paychecks?

7 A. Yes.

8 Q. You had mentioned ADP's -- or the company ADP
9 earlier. What was ADP's role in the payroll processing?

10 A. So in 2021 we had Kronos OC Pro. UKG was the
11 company name, I believe. And they were our payroll
12 processor, as well as employees sign on to their portal and
13 did all the pre-employment work.

14 Q. When did that change?

15 A. December 31st.

16 Q. Why did it change?

17 A. Meritain dropped us for non-payment.

18 Q. Okay. Do you know where Meritain's offices are?

19 A. No.

20 Q. Did you ever have to send correspondence or any
21 mail to or from Meritain?

22 A. Mail?

23 Q. Yes.

24 A. No. Not U.S. mail, no.

25 Q. What about e-mail?

1 A. Yes, I did -- I know that I did send a request to
2 them probably toward the end of 2021 to try and get a listing
3 of the outstanding claims. And they wouldn't give it to me.
4 But they did give it to Sophia.

5 **Q. Did you ever learn the total amount of what those**
6 **outstanding claims were?**

7 A. She did send me a copy of that spread sheet. So it
8 will be in one of those e-mails.

9 **Q. Okay. Do you remember what the number is?**

10 A. I think -- is it okay if I just --

11 **Q. Sure. Give me your best --**

12 A. Or should I say I don't know?

13 **Q. Give me your best estimate.**

14 A. I think it was 800,000.

15 **Q. Okay. And that's a great question. If you're not**
16 **sure -- but you have a good estimate -- just tell us that**
17 **you're estimating.**

18 A. Yes.

19 **Q. And then that way we're not going to hold you to**
20 **it.**

21 A. Yeah.

22 **Q. And that was 800,000 in unpaid claims as of the end**
23 **of 2021?**

24 A. Yes.

25 **Q. Did that include the amount of the unpaid premiums**

1 or just the amount of the unpaid claims?

2 A. What I believe that was was the claims that
3 Meritain had on hand. Not the withholdings.

4 Q. Do you know or have an estimate of about when in
5 the process premiums that were being withheld stopped being
6 passed on to Meritain?

7 A. I don't know.

8 Q. Who would know?

9 A. I would guess Corey Gibboney, the Controller, or
10 Sophia Binder. Let's see. Steve Parks -- we haven't talked
11 about him.

12 Q. No. Who is that?

13 A. So, Steve when I came on was the President of Noble
14 Health. And he was who I reported to. And he was the CFO, I
15 believe. I think that was his role. I'm not sure.

16 And so he was in the Leawood office. And so all of
17 that was happening up there -- you know, the discussions, the
18 payments.

19 Q. Did Mr. Parks ever leave that role?

20 A. He left in -- I think it was July 26th of '21.

21 Q. Do you know why he left that role?

22 A. Health issues.

23 Q. His own?

24 A. Yes.

25 Q. Was he replaced by anyone?

1 A. So I believe it was October, David Kitchens came on
2 board.

3 Q. Who is that?

4 A. I think he was the Corporate Controller, was his
5 title.

6 Q. He worked in the Leawood office?

7 A. Uh-huh. Yes.

8 Q. How long did Mr. Kitchens hold the role of
9 Corporate Controller?

10 A. I believe he left in May after Platinum came on.
11 And then Platinum furloughed the corporate staff.

12 Q. When did that happen that Platinum furloughed the
13 corporate staff?

14 A. I think it was in May. But I don't know the exact
15 day.

16 Q. May of 2022?

17 A. '21 -- oh, no. '22.

18 Q. Was there ever a time that 401-K withholdings were
19 being withheld from the employees, but they were not being
20 paid into the 401-K fund?

21 A. No.

22 Q. So is it a true or untrue statement that from when
23 you first set foot in Audrain Community -- or Audrain
24 Hospital until today, to your knowledge any 401-K payments
25 that were withheld were passed on to the 401-K fund.

1 A. To my knowledge.

2 Q. And do you believe you know the answer to that?

3 A. I do. Because mine is current. And I don't think
4 they would have just paid mine.

5 Q. Did the employer make their match throughout the
6 time period?

7 A. We didn't have a match.

8 Q. After premiums were being withheld, but not paid to
9 Meritain, was there ever a time that premiums started being
10 paid into some other insurance plan?

11 A. Yes.

12 Q. When did that start?

13 A. In January of '22. It switched to -- the broker
14 was Mid Missouri Cooperative. And the third-party
15 administrator was called Health EZ.

16 Q. And at that time was it an insurance plan, a
17 self-funded plan or a combination of the two?

18 A. A self-funded plan. And I believe that Principal
19 still carried the dental, and the vision, and the 401-K. And
20 that's -- and the Hartford still had the life insurance.

21 Q. Okay. At some point in early 2022 before the sale
22 to Platinum, were payments missed for the health insurance
23 premiums --

24 A. To?

25 Q. -- to the new carrier?

1 A. Yes. Yes.

2 Q. When did that happen?

3 A. I would guess -- I don't know for sure -- but I'm
4 guessing March.

5 Q. Were premiums still being withheld from employees
6 at that time?

7 A. Yes.

8 Q. So it's a true statement that premiums were
9 withheld from employees that were not passed on to the
10 insurance carrier.

11 A. I do believe that to be true.

12 Q. You indicated that Noble stopped using Kronos at
13 the end the year in 2021. And they started using a new
14 system at the beginning of 2022.

15 A. Yes. ADP.

16 Q. Did Noble Health use that throughout the remainder
17 of the Noble time?

18 A. ADP's last payroll was the March 4th payroll.
19 Noble paid one more payroll on March 18th -- but we were not
20 able to send it through ADP due to non-payment. So that was
21 it under Noble.

22 Q. Okay. And so after the payroll of March 18, 2022
23 were there any employees that went unpaid in that payroll?

24 A. After the payroll of March 18th, everyone went
25 unpaid. There were three payrolls in April that were missed.

1 Q. Okay. And that's a great clarification. Let me
2 ask a better question. Were there any employees that were
3 left unpaid in the March 18, 2022 payroll?

4 A. Not to my knowledge.

5 Q. Okay.

6 A. There may be a physician that didn't get their
7 quarterly extra payment for going to the Perry Clinic or
8 supervision of advanced practice providers. So I think some
9 of those extra pays didn't get paid.

10 Q. Okay. And then after -- and then there were three
11 payrolls that were missed?

12 A. Yes.

13 Q. Were any employees furloughed in March of 2022?

14 A. Not to my knowledge.

15 Q. Okay. Were employees furloughed in April of 2022?

16 A. Yes.

17 Q. How many?

18 A. Initially 175. And then we had people request to
19 furlough because they needed to go get a job.

20 Q. Okay. How many more people was that?

21 A. I won't know the exact answer. But probably 25
22 more.

23 Q. So, of the 175 people that were furloughed, how was
24 the decision made as to who would be furloughed?

25 A. So, again Platinum had shown up that week and said

1 we're going to get you guys open. And so the hospital staff
2 then didn't have anybody to take care of -- we furloughed all
3 of them. And we tried to keep as many department leaders as
4 we could because we were going to need them to kind of just
5 keep everything going in the department. I think there was a
6 lot happening all at once. But there may have been some
7 leaders that needed to furlough. And so then we kept
8 somebody else.

9 **Q. In the 175 -- was that just at the Audrain Hospital**
10 **or across all of the facilities?**

11 A. I think it was both hospitals.

12 **Q. Okay. Was anyone furloughed from any of the**
13 **clinics?**

14 A. No. Because of the missed payroll they began to
15 request. So I think they were some of the first ones -- you
16 know, it just seems like the lower paid ones needed to go get
17 a paycheck or unemployment. And so as they requested to be
18 furloughed, we allowed that, and then found somebody to fill
19 in.

20 **Q. Who made the decision to furlough employees?**

21 A. You mean the overall decision to furlough?

22 **Q. Uh-huh.**

23 A. That's where the discussion that Noble owners had
24 with the Polsinelli Law Firm on how to do this. And they had
25 John Parigi, a consultant, working with them on the finances.

1 **Q. Okay.**

2 A. And you know -- so I would have also been on those
3 calls where we were talking about what we needed to do. And
4 obviously, everybody continuing to show up and have nothing
5 to do didn't seem like a good idea.

6 **Q. Right.**

7 A. And we had no way to pay anybody.

8 **Q. And that kind of answers it. So the decision came**
9 **down from the owners and management of the Noble Health in**
10 **Leawood, is that right?**

11 A. Yes.

12 **Q. The same question as to the decision to not issue**
13 **checks after the March 18, 2022 payroll. Who made that**
14 **decision?**

15 A. I would say it was the owners, since there was no
16 money in the bank.

17 MR. STROMBERG: Just to get an objection in here.
18 Are talking about owners of Noble? Can you identify that for
19 us so we understand who you're talking about?

20 THE WITNESS: Drew, Tom and Don.

21 **Q. (By Mr. Werts) Okay.**

22 A. And Don actually retired or something like that in
23 August. And so he was not actively in these conversations in
24 March.

25 **Q. And that would be August of 2021?**

1 A. Yes.

2 Q. Do you know one way or other whether or not anyone
3 else was involved in the decisions to not issue payroll after
4 March 18, 2021 other than Drew, Tom and Don?

5 A. Yeah, I don't think Don was involved in that
6 decision at that time. So, I think it was just Drew and Tom.

7 Q. Okay.

8 A. And we just didn't have the money.

9 Q. And my question is a little bit different. Which
10 is do you know whether there was anyone else? Or it was just
11 100 percent those two?

12 A. As far as I know it was just those two.

13 Q. How were the employees told they were being
14 furloughed in April of 2022?

15 A. We had an all employee meeting. We had a call-in
16 number. So if you weren't on site in Mexico in the
17 cafeteria, we had a call-in number.

18 So they hired a communications person to help Jeff
19 and I script words to say. And Polsinelli was on those
20 calls. And so I believe that I'm the one that read that
21 script. Because we couldn't figure out -- we were trying to
22 split it between Jeff and I. But we couldn't get the
23 technology to work because we didn't have wi-fi.

24 Q. And was anyone from the corporate office present
25 for that meeting?

1 A. I honestly cannot remember that.

2 **Q. Okay. Do you know whether anyone from the**
3 **corporate office was on the electronic connection.**

4 MR. STROMBERG: I will just objection for vague and
5 ambiguous. I'm trying to figure out what corporate office
6 we're referring to. But go ahead.

7 **Q. (By Mr. Werts) Sure. Go ahead.**

8 A. So I think that Drew and Tom were there with me. I
9 really do think that. I feel sure they were on that day. It
10 would have either been the 31st or the 1st when that
11 happened. And I feel like they were there with me. But I
12 really can't remember.

13 **Q. Okay.**

14 A. But if they weren't there with me in person, they
15 were on the call.

16 **Q. Do you know whether there was anyone else from**
17 **Kansas City on the call?**

18 A. I don't know.

19 **Q. Was there any sort of minutes or roster kept of who**
20 **was on that call?**

21 A. No.

22 **Q. Was that call run through Zoom?**

23 A. No. It was through a Free Conference line.

24 **Q. Was that the name of the vendor, Free Conference?**

25 A. I don't know.

1 **Q. Do you know who set up the call?**

2 A. It could have been Jeff Stone or it could have been
3 Beth Ellefsen, who was the marketing person.

4 **Q. Beth is a new name. Who is that?**

5 A. Beth Ellefsen. She was the marketing website -- I
6 think her title was Director of Marketing.

7 **Q. Director of Marketing for whom?**

8 A. Noble Health.

9 **Q. Where was her office?**

10 A. In Leawood.

11 **Q. When did you first hear about Platinum?**

12 A. I believe we closed on a Friday. And I believe it
13 was the Monday. So, like the 28th of March.

14 **Q. How did you hear about them?**

15 A. Drew Solomon brought Cory Countryman into my office
16 Monday morning, and he said take Cory through the hospital,
17 give him a tour and answer any questions that he has.

18 **Q. And did you do that?**

19 A. First I said well, can we sit down so I understand
20 what we're -- who are you and what are we doing? And he told
21 me that he was with Platinum. And he was the President. And
22 that they are interested in buying the hospital.

23 **Q. Okay. Did you give him that tour?**

24 A. I did.

25 **Q. How long did that take?**

1 A. About two hours.

2 Q. Did you talk about the unpaid payroll during that
3 discussion?

4 A. This was March. Probably not. Because I think
5 that was before it happened.

6 Q. Okay. Do you know whether you ever talked to Cory
7 about the unpaid payroll before April 20 of 2022?

8 A. Yes.

9 Q. You seem very sure about that. How do you know
10 that?

11 A. Because if it wasn't that week when we told the
12 employees we were furloughing them, it would have been the
13 next week. Because we were having weekly all employee
14 meetings where they call in to get an update. That Cory
15 Countryman came and said we know that that's the most
16 important thing, and we need to get that taken care of.

17 Q. When did payroll start getting run again?

18 A. In May, under Platinum. And they started with
19 whoever was on after April 20th.

20 Q. At some point did Platinum wind up missing payroll?

21 A. Yes.

22 Q. When did that first occur?

23 A. August 19th.

24 Q. How many payrolls did Platinum miss?

25 A. Coincidentally, three.

1 Q. And those were all two week payrolls?

2 A. Yes.

3 Q. The same thing for Noble, the ones we talked about.

4 A. Yes.

5 Q. At some point during the Platinum regime were
6 employee benefits payments being withheld from the employees,
7 but not passed on to the appropriate vendors?

8 A. Yes.

9 Q. When did that first occur?

10 A. The first time that they withheld premiums they had
11 been negotiating with Blue Cross Blue Shield and -- for the
12 month of July. And so I believe that it was the first
13 paycheck that we got from them in July, they withheld the
14 whole month's worth of premiums. Which should have been half
15 and half. You know. They withheld the whole thing in that
16 first paycheck in July. And then the next paycheck in July
17 they withheld the whole month of August. And that's all they
18 did.

19 Q. Okay. And those withholdings were made. But were
20 those ever paid to the vendors?

21 A. I don't believe so. Because we never got
22 insurance.

23 Q. Did you ever investigate how much total
24 withholdings were made by Platinum in July that were never
25 paid to the appropriate vendors?

1 A. I never added that up.

2 **Q. Do you think that's on the thumb drive?**

3 A. It could be on one those payroll files. It could
4 be.

5 **Q. Did you ever investigate how much in total claims**
6 **got ran up during the Platinum regime for folks that were**
7 **expecting to have insurance?**

8 A. No. Because we never got any filed.

9 **Q. What were employees told about what insurance was**
10 **going to be available under Platinum?**

11 A. So, in June they gave us a letter that said if you
12 have any health claims, send them through Platinum. And I
13 think they were going to withhold whatever our premium was,
14 and then they were going to like self fund it. But they
15 never withheld those premiums and they never, to my
16 knowledge, ever paid any of those.

17 We did have employees try to call them at the
18 number they had on the letter. I don't think anyone was
19 successful to my knowledge. But did that answer the
20 question?

21 **Q. It does, actually.**

22 A. I'm starting to lose what I've said.

23 **Q. No, this stuff is a little technical. And you're**
24 **doing great actually on that.**

25 I want to bounce back. Under the period of time

1 **that Noble was withholding but not paying the health**
2 **insurance, were the employees ever notified about that?**

3 A. No.

4 **Q. Why not?**

5 A. So, we had applied for the HRSA grant. And
6 previously SSM in 2020 received -- I believe 10.7 million
7 dollars. And so Drew thought in 2021 we were going to get
8 10.7 million dollars in November or December. Because we
9 reapplied for the HRSA funds.

10 **Q. What is HRSA?**

11 A. I don't know. It's a federal thing. And the
12 American -- or the provider relief funds -- ARPA also. Maybe
13 it's American Recovery -- I don't know. Anyway, it's the
14 federal government.

15 **Q. Okay.**

16 A. And so Drew was just sure that -- and he was
17 telling Meritain and everybody else that when we get these
18 moneys then we're going to pay everything we owe. And we got
19 a rural health payment of 1.38 million in November. And to
20 the best of my knowledge that went to payroll and to buy
21 immediate supply needs. And then in December another 1.3
22 million dollar payment again went to payroll and supply
23 needs, to my knowledge. And that's all we got.

24 **Q. In those two 1.3 million dollars payments -- was**
25 **that for Audrain Hospital, all facilities --**

1 A. Audrain.

2 Q. Okay. Do you know whether or not Callaway Hospital
3 got a similar payment?

4 A. They did not.

5 Q. Do you know why not?

6 A. I don't know why. But they never got their funds.

7 Q. Okay. Were you at Audrain Medical Center during
8 the time that the federal government was administering the
9 Payroll Protection Act or PPP loans?

10 A. So I came in February of '21. And I know that
11 Audrain got a PPP forgiveness.

12 Q. Okay.

13 A. So, yes.

14 Q. Okay. And was that forgiveness for the first loan
15 or second loan or both?

16 A. I don't know that.

17 Q. Okay. Do you know how much the forgiveness was?

18 A. To the best of my knowledge that I can remember I
19 think it was 3.2 million.

20 Q. Okay. Do you know whether or not the Audrain or
21 any of these facilities received any of what is called an
22 Eidl or an E-I-D-L loan?

23 A. I have not heard of that.

24 Q. Were there any other government Corona virus
25 related benefits programs that you're aware of that Audrain

1 **Medical Center got that I have not brought up?**

2 A. I believe we got a -- I know we got \$600,000. And
3 I think it was for the clinics to do Covid testing.

4 **Q. Okay. Anything else?**

5 A. That's all I know of.

6 **Q. So, August 19, 2022 Platinum misses its first**
7 **payroll, correct?**

8 A. Correct. Yes.

9 **Q. At some point thereafter were a group of employees**
10 **furloughed?**

11 A. So, in the first round of furloughs I gave
12 everybody a letter that said we were furloughing them. I
13 don't remember doing that under Platinum.

14 **Q. Okay.**

15 A. You know, we had only brought back what we would
16 have considered the essential people to get the hospital
17 open. So I don't remember furloughing -- so, your question
18 was after August 19?

19 **Q. Yes.**

20 A. So, Platinum at one point made the decision they
21 were not going to reopen Callaway. And so I do think there
22 was some Callaway. But that wasn't -- I didn't do them.

23 **Q. Okay.**

24 A. So --

25 **Q. Do you --**

1 A. I believe that happened before the September 9th.

2 Q. Okay.

3 A. Yeah.

4 Q. Do you know who made that decision?

5 A. Cory Countryman.

6 Q. Was anyone else involved in that decision?

7 A. Probably Melissa Upshaw. But I don't know for
8 sure.

9 Q. And then what happened on September 9th?

10 A. They didn't get -- they were trying to get funds
11 and investors, I guess, and were not successful. So they
12 just sent the e-mail out to everybody that we were all
13 terminated.

14 (Exhibit 7 was marked for the purpose of
15 identification herein.)

16 Q. (By Mr. Werts) I'm going to hand you what has been
17 marked as Deposition Exhibit No. 7. Have you ever seen this
18 before?

19 A. No.

20 Q. Do you recognize the name Jerry Goh?

21 A. No.

22 Q. Do you recognize the name Jeannette Quinn?

23 A. Yes.

24 Q. Who is Jeannette Quinn?

25 A. She was the pharmacist at Callaway.

1 Q. And so she was one of the employees that did not
2 receive payment after March 18, 2022, is that correct?

3 A. Yes.

4 Q. For employees that weren't furloughed, under the
5 Platinum time were any efforts ever made to make payments to
6 catch up some of the payrolls that were missed in March and
7 April of 2022?

8 A. That was the one time where we almost made a
9 partial payment for the April 1st. They were going to pay
10 one week of that missed payroll. And I believe we told
11 employees they could pick it up on July 6th. But the funding
12 didn't come, so we did not release those checks.

13 Q. Okay. And so anybody who didn't get paid after mid
14 March 2022, they all -- nobody ever got paid back any of that
15 money, right?

16 A. No.

17 Q. And they are all just kind in the same boat, right?

18 A. Yeah. I'm in there.

19 Q. You're there, too.

20 A. I'm in the boat.

21 Q. And it was the same policy and decision that led to
22 all of those employees not being paid at the same time,
23 correct?

24 A. Yes.

25 Q. And that's true for both the six weeks of missed

1 pay in March and April of 2022, as well as the six weeks of
2 missed pay starting in mid August of 2022, right?

3 A. Yes.

4 Q. Correct. It's not a situation where someone went
5 through and decided this person is getting paid, that person
6 is not getting paid.

7 A. They did not.

8 Q. It's just everybody is treated the same.

9 A. Everybody is treated the same.

10 Q. And that is also true as to the insurance benefits
11 that were withheld, but not passed on to the appropriate
12 vendors, correct?

13 A. Correct.

14 Q. And that's true for both times that happened both
15 in March as well as in the late summer of 2022.

16 A. Correct.

17 Q. Are you aware of any conflicts of interest that Ms.
18 Quinn may have with the other employees at either the
19 Callaway or Audrain Medical Center?

20 A. I'm not.

21 Q. All right. You can set that aside for now. I may
22 come back to it.

23 (Exhibit 8 was marked for the purpose of
24 identification herein.)

25 Q. (By Mr. Werts) I'm going to hand you now what has

1 been marked as Deposition Exhibit No. 8. Have you ever seen
2 this before?

3 A. Was that included with my subpoena?

4 Q. This was not included with your subpoena.

5 A. Oh.

6 Q. When the original lawsuit was filed it was served
7 on a number of entities. And what has been marked as Exhibit
8 8 was included in that packet.

9 A. Oh, okay. It's a little bit different, yeah. No,
10 I have not seen this before.

11 Q. Okay. Has anyone ever asked you to look for
12 documents in response to a document request that we have made
13 in this lawsuit?

14 A. No.

15 Q. When did you first become aware of this lawsuit?

16 A. On January 17th -- oh, of the class action lawsuit?

17 Q. Yeah.

18 A. I heard that, yeah. I don't know when I first
19 became aware of it. I heard it was happening.

20 Q. Okay. And I'll represent to you this was filed in
21 August of 2022 is when the lawsuit was first filed. Did
22 anyone at Platinum ever tell you that the class action
23 lawsuit had been filed?

24 A. No.

25 Q. Did anyone at Saint Pio ever tell you about the

1 **class action?**

2 A. No.

3 **Q. Did anyone at Pasture Medical?**

4 A. No.

5 (Exhibit 9 was marked for the purpose of
6 identification herein.)

7 **Q. (By Mr. Werts) I'm going to hand you what has been**
8 **marked as Deposition Exhibit No. 9. Have you ever seen this**
9 **before? This was also included with the service packet of**
10 **the original lawsuit.**

11 A. I have not seen this before.

12 **Q. Okay.**

13 (Exhibit 10 was marked for the purpose of
14 identification herein.)

15 **Q. (By Mr. Werts) I'll hand you now what has been**
16 **marked as Deposition Exhibit No. 10. Have you ever seen this**
17 **before?**

18 A. I have not.

19 **Q. Have you ever seen this letterhead before?**

20 A. No.

21 **Q. Okay. If you will look in the fourth paragraph**
22 **that starts, as a full-time employee --**

23 A. Uh-huh.

24 **Q. -- do you see that?**

25 A. Yes.

1 Q. There is something called an EAP. Do you know what
2 that is?

3 A. Employee assistance program.

4 Q. Was that a benefit that was offered under either
5 Noble Health or Platinum?

6 A. I do believe in our benefits booklet we had an
7 employee assistance program. It was a phone number to call.

8 Q. Do you know whether or not that program was ever
9 discontinued due to lack of funding?

10 A. I don't know the answer to that.

11 Q. During your time with either Noble or Platinum was
12 paid time off a benefit that was offered?

13 A. Yes.

14 Q. How did that work?

15 A. So, in the beginning they had PTO, and there was a
16 schedule based on your years of service, how much PTO you
17 got. I had a contract that stated what I had. And then
18 there was holiday pay. And then at some point during the
19 year -- probably November or December -- we did the work to
20 start 2022 with only PTO. Not PTO and holidays. So we
21 passed the Board resolution for that. We did it at Audrain.
22 I can't tell you whether Callaway did it or not.

23 Q. And so under the PTO and holiday pay system, were
24 employees required to take it as time off or could they be
25 paid out to kind of empty out their banks?

1 A. So, I don't know when Noble changed. But it was at
2 some point they changed to a maximum of 80 hours paid out.

3 **Q. Okay.**

4 A. But I don't know if I started under that or since
5 mine has no -- I don't accrue like that and I had no cash
6 value. So I didn't pay attention to it. But I do know that
7 it did change at some point.

8 **Q. Okay. But would you say that the other employees**
9 **other than yourself -- that their PTO had a cash value?**

10 A. Yes. Up to 80 hours.

11 **Q. And was that something that was tracked by someone?**

12 A. It was in the payroll system. And in the Kronos
13 system I kept hearing it was never tracking it correctly.
14 And they kept trying to work with Kronos. And they couldn't
15 track it correctly. So they had a spread sheet that they
16 were tracking it.

17 **Q. When you say they, who are you referring to?**

18 A. The payroll office.

19 **Q. Was that in Leawood?**

20 A. No. It was at Callaway. And then they moved the
21 Audrain.

22 **Q. Did the holiday pay have a cash value?**

23 A. No. I mean other than when you got paid for not
24 working that day.

25 **Q. Okay.**

1 A. Yeah.

2 Q. Okay. I guess that makes sense.

3 A. Yeah.

4 Q. So a holiday comes. You don't have to work. But
5 you get paid for that day.

6 A. Yes.

7 Q. Paid time off, you could take it or it had a cash
8 value the employees could draw on.

9 A. Yes. I'm trying -- I don't know if they could cash
10 it out. I don't think so.

11 Q. Okay.

12 A. I think it was if you left -- like if you left
13 employment, you could get paid out up to 80 hours. But I
14 don't think you could choose to cash it in.

15 Q. I see. Unless you quit your job.

16 A. Unless you quit.

17 Q. But if you quit your job, the normal practice was
18 to pay out the PTO.

19 A. Correct.

20 Q. Was there ever a time that the employees weren't
21 paid out PTO at the conclusion of their employment?

22 A. Not -- when we furloughed everybody, we didn't pay
23 out PT.

24 Q. You didn't pay anything.

25 A. We didn't pay anything.

1 **Q. Right.**

2 A. But up until then when people left, as far as I
3 know they got their PTO.

4 (Exhibit 11 was marked for the purpose of
5 identification herein.)

6 **Q. (By Mr. Werts) I'm now going to hand you what has
7 been marked Deposition Exhibit 10.**

8 **(OFF THE RECORD.)**

9 MR. WERTS: Go off the record just a moment.

10 THE VIDEOGRAPHER: The time is 1:18 p.m. We are
11 off the record.

12 (OFF THE RECORD.)

13 THE VIDEOGRAPHER: The time is 1:19 p.m. We're
14 back on the record.

15 **Q. (By Mr. Werts) Okay. Back on the record after a
16 short break. We decided it's Exhibit 11, not Exhibit 10 as I
17 previously said.**

18 A. Yes.

19 **Q. Are you familiar with the format of Exhibit 11?**

20 A. Yes.

21 **Q. What are we looking at here?**

22 A. It's an electronic pay stub out of. 2021 this is
23 out of Kronos.

24 **Q. And every employee at all nine of the facilities we
25 have been talking about would have gotten pay stubs in this**

1 format for every payroll, correct?

2 A. Yes.

3 Q. I want to just make sure I'm not making
4 assumptions. When you start under earnings it says eve diff
5 \$1.25. Do you see that?

6 A. Yes.

7 Q. Do you know what that is referring to?

8 A. Evening differential. So, if they work -- I don't
9 know the exact hours of the evening differential -- but if
10 your hours calculated whatever that time frame was you got
11 \$1.25 an hour extra.

12 Q. Okay. And then holiday -- that's just the holiday
13 pay we were previously talking about?

14 A. Uh-huh.

15 Q. Is that yes?

16 A. Yes.

17 Q. What is the difference between that and holiday
18 worked?

19 A. Holiday worked, you get time and a half. Where
20 holiday you just got time for not working.

21 Q. Okay. And then if we kind skip over overtime and
22 regular pay -- because those are self-explanatory. There is
23 one that says WE plus EV \$2.5.

24 A. That would be weekend plus evening. So, that would
25 be the weekend differential of 1.25, and then the evening

1 differential of 1.25. So, if you worked a weekend in the
2 evening you got that.

3 Q. Got it. And the last one is just the \$1.25
4 differential.

5 A. Yes.

6 Q. We look at the deductions -- we have talked about
7 the 401-K, the dental, and medical co-pay, the vision --
8 there is three more on here we didn't talk about earlier.
9 Basic life, ADD -- that's the life insurance you were talking
10 about through the Hartford?

11 A. Yes.

12 Q. And then there is also a long term disability and
13 short term disability. Is that also insurance that was
14 offered?

15 A. It was.

16 Q. Who was that through?

17 A. I don't think I know.

18 Q. Was there ever a time that premiums were withheld
19 for long term or short term disability that were not passed
20 on to the vendor?

21 A. I would believe so.

22 Q. How would we find out?

23 A. Well, if we knew who the vendor was we probably
24 haven't -- I mean we could look and see if there is an
25 outstanding -- I would imagine it would have all gone to the

1 broker.

2 Q. Okay.

3 A. And then it would have been on the broker's
4 invoice.

5 Q. Okay. And then there is e-mails between you and
6 the broker inside your e-mail accounts, correct?

7 A. I believe -- I don't remember seeing this level of
8 detail from HUB. So if it wasn't the Hartford, it might be
9 Principal. I just don't know.

10 Q. Okay.

11 A. I don't know where those fell.

12 Q. Okay.

13 (Exhibit 12 was marked for the purpose of
14 identification herein.)

15 Q. (By Mr. Werts) All right. I'm handing you what we
16 are marking as Exhibit 12. Do you recognize this?

17 A. Yes.

18 Q. What is this?

19 A. This was the furlough letter sent to the employees.

20 Q. And this is what was sent to April of 2022?

21 A. Correct.

22 Q. Is that your signature at the bottom?

23 A. Yes, it is.

24 Q. And the same letter went to every employee that was
25 furloughed, correct?

1 A. From Audrain.

2 Q. And I guess this is Audrain. Did each facility use
3 their own letterhead?

4 A. As far as I know.

5 Q. Were you assisted with counsel in putting together
6 this letter?

7 A. Yes.

8 Q. Who was the lawyer that helped you with this?

9 A. Well, it was Polsinelli. I don't remember their
10 name.

11 Q. Okay. Was it a guy named Jay Dade?

12 A. If you said the name I would remember it. But I
13 know that wasn't it.

14 MR. STROMBERG: There is a few lawyers over there.

15 MR. WERTS: There is a lot.

16 MR. STROMBERG: Could narrow it down a bit.

17 Q. (By Mr. Werts) I spent both summers in law school
18 working for Jay. He's the head of the employment department
19 now. So --

20 A. I want to say it was three women.

21 Q. They have plenty of folks over there. It's funny
22 -- in 20 years I haven't had case yet with Jay. I keep
23 looking for one.

24 Okay. And I don't have an example of it. But
25 looking at Exhibit 11, which is the payroll stub --

1 A. Yes.

2 Q. -- was there something like that that was used by
3 ADP whenever they were doing the payroll?

4 A. Yes.

5 Q. All of the same basic information?

6 A. Yes.

7 Q. None of the benefits or categories of time changed,
8 correct?

9 A. Correct. To my knowledge anyway.

10 Q. Okay. What about the time that you were using
11 handwritten checks from Platinum? Were employees given some
12 sort of a stub?

13 A. They were on the check. So it was like they tore
14 it off and deposited your check.

15 Q. Did it have all the same information?

16 A. I don't know.

17 Q. Did all the employees get the same basic
18 information under the hand-signed Platinum checks?

19 A. Everybody got -- so those checks came from
20 different entities from time to time.

21 Q. Okay.

22 A. And that's why I don't know the bank and I don't
23 know -- I don't know what they were doing. But everybody got
24 the same as far as I know.

25 Q. Okay.

1 A. You know, it came in either Fed Ex or Cory
2 Countryman handed them to us.

3 **Q. Okay. And you said sometimes there were different**
4 **entities writing the checks.**

5 A. Well, the name that was on the check -- like I'm
6 pretty sure I got one that said Callaway Community Hospital.
7 I know I got one that said Platinum Neighbors. And then I
8 started getting Noble Health Audrain, Inc.

9 **Q. Okay.**

10 A. I don't believe that under Platinum they called it
11 Noble People.

12 **Q. Okay.**

13 A. To the best of my knowledge.

14 **Q. Okay. But regardless of the entity, they were**
15 **always kind signed by Ryan Cole.**

16 A. Yes. As far as I know.

17 **Q. Okay.**

18 A. Things I don't pay attention to.

19 **Q. You actually remember it better than most do. We**
20 **have talked about Neuterra a little bit today. Other than**
21 **being at their building in Leawood a few times, had you ever**
22 **-- did you ever come across their name in any of the other**
23 **documents that you were looking at?**

24 A. No.

25 **Q. Were you aware that Don Peterson had previously**

1 **been charged with Medicare fraud?**

2 A. Yes.

3 **Q. Tell me about that, please.**

4 A. It was probably right about the time we were going
5 the switch to owning from SSM. I remember we were meeting at
6 the bed and breakfast conference table, and Don made the
7 comment that after next Tuesday I can't come in the building.
8 And Steve Parks was there. And so after that meeting I said
9 why can't Don come in the building? And he said well, he has
10 an issue with Medicare. And so he can't be in operations.

11 **Q. Did Mr. Peterson continue to be involved in**
12 **operations?**

13 A. He did.

14 **Q. How so?**

15 A. He would participate on our phone calls. Teams
16 meetings. He would come to town and participate in meetings.
17 He would e-mail me.

18 **Q. Okay. Did Mr. Solomon, Mr. Peterson and Mr. Carter**
19 **kind of divide up the responsibilities of how they were**
20 **helping with management?**

21 A. Yes.

22 **Q. Tell me about that, please.**

23 A. So, after we opened Drew took on the leadership
24 role of the operations. But Don had more experience in
25 health care than Drew did. So he was constantly trying to

1 help move things along.

2 Q. And Mr. Carter?

3 A. He was more public relations. Setting up community
4 meetings and things like that.

5 Q. Okay. We have talked about a couple of trips to
6 the Leawood corporate office. How often did you have other
7 interactions with the Leawood corporate office?

8 A. Well, almost every day we had a Teams call.

9 Q. Tell me about that.

10 A. So once we opened -- so from March 16th until
11 probably April 16th was a real blur. I don't know if I did
12 phone calls with them or not. And I can't tell you who was
13 on the phone or not. We had switched to a new electronic
14 record. And the company, Azalea Health could not travel here
15 because of Covid. And so we were putting it in basically
16 ourselves with them on a computer telling us what to do. And
17 we had patients in the hospital. So that was priority number
18 one is, you know, I was trying to support the staff to do the
19 work to make sure we had everybody safe.

20 So for that first month I can't tell you what
21 happened. But somewhere after we got to a point where we
22 needed to start worrying about trying to get bills out the
23 door, we started having daily Teams meetings to talk about
24 setting up the billing.

25 Q. And who all would be on these calls?

1 A. In the beginning Aaron Gash was the senior revenue
2 director out of the Leawood office. And so Don, and Aaron,
3 and me and Jeff -- Jeff Stone. And there were probably other
4 people on there. Where we would be talking -- oh the
5 registration -- Jan Hoyt was over registration at Audrain.
6 And then Betty -- I cannot remember Betty's last name right
7 now -- Loggerman -- was on Callaway with Jeff.

8 And so we were on phone calls every day just
9 talking about the problems that we were seeing, and trying to
10 get billing set up.

11 (Exhibit 13 was marked for the purpose of
12 identification herein.)

13 **Q. (By Mr. Werts) All right. I have handed you now**
14 **what has been marked as Deposition Exhibit 13. Do you**
15 **recognize this?**

16 A. Yes.

17 **Q. Tell me what this is, please.**

18 A. This was a copy of the e-mail that we all got from
19 Platinum.

20 **Q. Okay. And when you say we all, do you mean**
21 **everyone at all nine facilities?**

22 A. Yes.

23 **Q. And so it was on Noble Health letterhead, but**
24 **signed Platinum Hospital Systems, correct?**

25 A. I didn't remember it being on Noble -- I mean I

1 don't remember seeing that on my e-mail. You know, I
2 probably just read the words. But I had already heard it.
3 We didn't all get it at the exact same time. It was kind of
4 weird.

5 Q. Okay.

6 A. It came in waves.

7 Q. Do you know the name Terry Blakely?

8 A. Yes.

9 Q. Who is that?

10 A. He's a pharmacist at Audrain.

11 Q. And any reason to dispute that this was a letter
12 that Mr. Blakely received?

13 A. No. I just don't remember it being on letterhead.

14 Q. And was this the letterhead that was being used
15 consistently by management at the end?

16 A. No.

17 Q. Was there some other letterhead being used?

18 A. Yes.

19 Q. What did it say?

20 A. Platinum Health Systems.

21 Q. Did it have an address for Platinum Health Systems?

22 A. I don't remember seeing a corporate one. So, we
23 had one for Audrain and one for Callaway.

24 Q. Were all nine facilities using the Platinum Health
25 Systems letterhead?

1 A. I don't know what the clinics -- I don't know if
2 they ever sent letters. We didn't have letterhead printed
3 up. So anything would have been done off of a template on
4 the computer.

5 **Q. Did you have other templates besides the Platinum**
6 **Health Systems template for letterhead?**

7 A. Just the Noble Health one.

8 **Q. This Noble Health one?**

9 A. It said Audrain Community Hospital.

10 **Q. So it looked like Exhibit 12?**

11 A. Yes.

12 **Q. Okay. How long had you been using the letterhead**
13 **as shown on Exhibit 12?**

14 A. My secretary probably designed that. I don't know.
15 I don't know when she would have done it. After the
16 transition.

17 We weren't sure how things were going. You know.
18 So she got this -- the N -- this part -- from Beth Ellefsen.
19 Maybe the whole Noble Health part. And then she probably put
20 the Audrain Community Hospital on there.

21 **Q. Okay.**

22 A. Or maybe Beth did it. Beth could have done it.

23 **Q. Okay. And so the stylized N on Exhibit 12 in the**
24 **logo -- that's what you were pointing to, is that right?**

25 A. Yes.

1 Q. And when you say that you started using it during
2 the transition -- are you referring to the transition from
3 SSM to Noble Health?

4 A. Correct.

5 Q. Okay.

6 A. We stopped using SSM logo and removed all of that
7 from the building. And then we had some of these vinyl N's
8 -- and Noble Health created to put on signage or banners.
9 The banners outside of the clinics.

10 Q. Okay. Where else was that stylized N used?

11 A. As far as I know the hospital -- the website.
12 Signage -- billboards on I-70. That's all I know.

13 Q. Okay.

14 A. Logowear.

15 Q. Okay. Like polo shirts and that sort of thing?

16 A. Uh-huh.

17 (Exhibit 14 was marked for the purpose of
18 identification herein.)

19 Q. (By Mr. Werts) I'll hand you what has been marked
20 as Deposition Exhibit 14. And on Exhibit 14 there is kind of
21 a large chunk at the top that is redacted out. What that is
22 -- this was an e-mail that got forwarded to us from a client.
23 So it has like the e-mail -- like the paralegal's -- so this
24 is an e-mail from you, is that correct?

25 A. Yes.

1 Q. And that's the a.obrien@platinumhealthsys.org --
2 that e-mail we talked about, correct?

3 A. Yes.

4 Q. And do you remember sending this e-mail?

5 A. Yes.

6 Q. Tell me about it.

7 A. So this would -- this is the next day -- no, it was
8 that night. We had received the e-mail in different waves.
9 And I just felt like after all we had been through, I needed
10 to say something. So I sent this out. Owen Schuler
11 presented down at Platinum Health on August 15th, and came to
12 Audrain on the 17th of August, and was interested in
13 purchasing the hospital. And so I put that in there.
14 Possibly still talking with him.

15 Corey Gibboney was the Controller. And she sent
16 out an e-mail -- or sent me what she had done to request her
17 payroll according to Missouri law. And then so we created
18 that template for other people to use.

19 Q. Okay. Did you receive claims like this from
20 different folks?

21 A. Did I receive it?

22 Q. Uh-huh.

23 A. They sent it to Platinum.

24 Q. They sent it straight to Platinum. You weren't
25 copied on any of that?

1 A. Yeah, I have a lot them that I helped with.

2 Q. Okay. And are they somewhere in your e-mail?

3 A. Yeah, they should be in my sent. Uh-huh.

4 Q. And which account? The Platinum Health --

5 A. Probably the Noble.

6 Q. Noble.

7 A. Well, I don't know.

8 Q. Okay.

9 A. I don't know.

10 Q. In one of the two?

11 A. Yeah. At this point I'm not sure which one I was
12 using.

13 Q. Okay. Do you know whether any of these people ever
14 got paid anything?

15 A. To my knowledge they did not.

16 Q. Did you ever undertake to add up what the total
17 amount that was owed after the August and September payrolls
18 were missed?

19 A. It surprises me if I didn't. But I don't remember
20 that right now.

21 Q. Okay. Did you ever undertake to add up how much in
22 withheld employee benefits amounts were not passed on?

23 A. I looked at one payroll when I was preparing the
24 March 18th one to send to the current owners, so they could
25 try to get the W-2's for 2022. And it was around 37,000 for

1 one payroll.

2 Q. Okay. And would you expect that to be relatively
3 linear across the missed payrolls?

4 A. So that would have been the March 18th. We would
5 have had a higher number of employees then because no one had
6 been let go yet. So that's probably higher than the last
7 three would have been.

8 So the Noble ones -- that might be consistent. But
9 then the Platinum ones is probably more like 20,000 would be
10 my guess.

11 Q. Okay. And you say -- lawyers hate the word guess.
12 Is that a guess or is that kind of an educated estimate?

13 A. I would say to the best of my knowledge.

14 Q. Okay. Did you ever get any response from the folks
15 at Platinum after sending out -- or as a result of this of
16 the mail you sent out December 9, 2022?

17 A. So, no, I don't know if they got this e-mail. But,
18 like I sent my request for payroll certified, and I got my
19 return receipt. A lot of -- they quit picking them up after
20 a while, and everybody got theirs back.

21 Q. Do you remember how much you said that you were
22 owed?

23 A. It's right at 100,000.

24 Q. Did that include the 30,000 in credit card
25 expenses?

1 A. Yes. It did not include the additional 60 days.
2 So the Missouri law says if you don't pay, then you have got
3 the keep paying me for 60 days. It did not include that
4 either.

5 Q. Okay. Have you had any contact with anyone at
6 Platinum since you were let go on September 9th?

7 A. Yes.

8 Q. Tell me about that.

9 A. Because they kept asking me to do things. And in
10 early November -- so the walk-in clinic was still open. And
11 in early November Cory Countryman brought two other
12 individuals to look at the hospital to buy it. And then the
13 two individuals who came to look to buy it wanted a lot
14 information. And I said to Cory Countryman, can I share with
15 them? Yes. Yes.

16 Q. Okay. What types of information did you give them?

17 A. A listing of the outstanding payables and
18 liabilities, which would included the past payroll.

19 Q. Who were those folks?

20 A. Who were they?

21 Q. Uh-huh.

22 A. One was Herman Ure. U-r-e I believe was his last
23 name. And the other one was -- actually I'm not exactly sure
24 of the other guy's name.

25 Q. Okay.

1 A. But you will see that Herman Ure is who I was
2 e-mailing, too.

3 Q. I want to run some different entity names past you.

4 A. Okay.

5 Q. Have you ever heard of Noble Health Audrain Care?

6 A. Yes.

7 Q. What is that?

8 A. Audrain Community Hospital.

9 Q. Have you ever heard of Noble Health Real Estate,
10 LLC?

11 A. Yes.

12 Q. What is that?

13 A. I just found out that that's the one that owned
14 Callaway.

15 Q. Okay. And so did it own the hospital or just the
16 land and the building? Or do you know?

17 A. I believe the land and the building.

18 Q. Okay. Have you ever heard of Noble Health Real
19 Estate II, LLC?

20 A. Yes.

21 Q. What is that?

22 A. So I believe that's the one that owns the Audrain
23 land and building.

24 Q. Okay. Have you ever heard the entity Platinum Team
25 Management, Inc.?

1 A. Yes.

2 Q. Who is Platinum Team Management, Inc.?

3 A. I'm not sure.

4 Q. Do you know what their relationship is to Platinum
5 Health Systems?

6 A. I believe it's sort of all the same. Because their
7 e-mails they had Platinumteam.org, were some people's. And
8 then Platinumhealthsys were some. So, Platinumneighbors were
9 some.

10 Q. And all that would be in your e-mail account,
11 right?

12 A. Yes.

13 Q. Okay. Did some people have multiple e-mail
14 addresses?

15 A. Yes.

16 Q. Okay. And could you ever discern any pattern of
17 when they were send e-mails from one entity versus another?

18 A. Not really.

19 Q. Have you ever heard of something called FMC
20 Holdings, LLC?

21 A. No.

22 Q. Have you ever heard of TechWeek, LLC?

23 A. I haven't. But I have seen that on some mail. And
24 I don't know what that is.

25 Q. Okay. Have you ever heard DJA Distribution, LLC?

1 A. DJA. No.

2 Q. Have you ever heard of Center for Rural Health
3 Innovation?

4 A. Yes.

5 Q. Tell me about that.

6 A. So shortly after the transition, Drew and Tom came
7 down and said that I believe the State had awarded us -- so I
8 don't know if us was Noble Health or -- anyway, I believe it
9 was a two million dollar grant to build a Center for Rural
10 Health Innovation into the third floor of the Stribling
11 Building.

12 Q. What is the Stribling Building?

13 A. It is the medical office building that is on the
14 campus of Audrain Community Hospital. But something
15 happened, and the funding got disappropriated, and nothing
16 ever happened.

17 I did meet with -- there was a group called -- I
18 think it was called Bio STL that came down. And it was going
19 to be a part of this Center for Innovation.

20 Q. When you say disappropriated, meaning Noble never
21 got it? Or it was used for something else?

22 A. As far as I know Noble never got it.

23 Q. Have you ever heard of the W.A. Solomon Land and
24 Cattle, LLC?

25 A. I have only seen that in some of the legal

1 materials.

2 Q. Have you ever heard of a different entity called
3 Noble Health Corporation?

4 A. Well, I believe that would be Noble Health at the
5 Leawood office.

6 Q. Had you ever heard of Noble Health Fulton, Inc.?

7 A. Yes. That's the Callaway Community Hospital.

8 Q. And then we have already talked about Noble People,
9 LLC.

10 A. Yes.

11 Q. Okay. Have you ever heard of FMC Clinic, LLC?

12 A. I just did last week when Pasture was filing that
13 bankruptcy. They were included in that.

14 Q. Okay.

15 (Exhibit 15 was marked for the purpose of
16 identification herein.)

17 Q. (By Mr. Werts) All right. I'm handing you now
18 what has been marked as Exhibit 15. Have you ever seen this
19 before?

20 A. I don't think I have seen this -- I may have. I
21 don't think I have seen this exact thing.

22 Q. Okay. And so looking at the first paragraph, it
23 references a couple of different companies, Noble Health Corp
24 and Noble Health Services, Inc. Do you know what the
25 difference between those two things are?

1 A. I don't.

2 Q. So if you turn to Page 6 -- actually 5 of 8 -- I
3 don't know. There are lot of those. Sorry. Page 4 of 8.
4 And so do you see NC Holdings, LLC, as shareholder with the
5 name Jeremy Tasset?

6 A. Yes.

7 Q. Were you aware of any role Mr. Tasset had in the
8 management of the hospital under the Noble regime?

9 A. No. In fact Don and Drew made it a point several
10 times to say that Nueterra has nothing to do with Noble.

11 Q. Okay. Had you ever heard the name Jeremy Tasset
12 before we started looking at documents here today?

13 A. Yes. Yes.

14 Q. And I think you actually talked about that -- that
15 you had met him whenever you went to the Leawood office. Had
16 you heard that name before you got to the office that day?

17 A. Yes.

18 Q. How so?

19 A. Drew had mentioned his name from time to time. I
20 don't know in the context. It's possible he even came to
21 Audrain once. I think they may have been going to St. Louis
22 or something, and stopped in.

23 Q. Okay.

24 A. And maybe I met him there.

25 Q. Okay. Any other interactions with Mr. Tasset?

1 A. No. I never talked to him on the phone or
2 anything.

3 **Q. Turn to Page 5 of 8. It says Noble Health Audrain,**
4 **Inc. There is a name Sheila Ennis. Do you see that?**

5 A. Uh-huh.

6 **Q. Who is that?**

7 A. She was a Board member. I believe her first Board
8 meeting was February of '22.

9 **Q. And is she from Mexico?**

10 A. Vandalia, I think.

11 **Q. Dr. Joseph Carrado.**

12 A. Yes. He's a general surgeon.

13 **Q. Steve Hobbes?**

14 A. He was a community board member.

15 **Q. And then if you will look at the first page --**
16 **going back to that --**

17 A. Okay.

18 **Q. In the first paragraph it lists off a variety of**
19 **clinics. Are those all -- it appears that the names are**
20 **slightly different -- some of the facilities that we**
21 **described earlier.**

22 A. Let's see. All right. So, what we described
23 earlier, we were looking at the Missouri Works application.

24 **Q. Right.**

25 A. And when Noble bought from SSM, that is all the

1 clinics we had. So let me show you this one. The Stribling
2 Building which has medical office clinics -- we put a pain
3 management, orthopaedic clinic in there.

4 **Q. Okay.**

5 A. And that one was actually at essentially 515 East
6 Promenade instead of 6. And then the cancer center building
7 -- 713 East Jackson is attached to the main building. You
8 know. So we don't ever -- it's just there.

9 **Q. Got it.**

10 A. The Cornerstone Clinic is a building that we owned.
11 And that's at 605 East Promenade. They started in August of
12 '21.

13 The Vandalia Medical Clinic is owned by -- the
14 building is owned -- but we did not have a clinic there. It
15 wasn't staffed.

16 Then we had Montgomery City Medical Clinic. We had
17 the Wellsville Medical Clinic, Perry Medical Clinic. And
18 then the East Summit Clinic admin office -- 626 -- it was
19 vacant. The Suite K. And then we had a Women's Health
20 Clinic -- they employed the GYN surgeon there. And he was in
21 Suite J upstairs on that clinic. Both of those are vacant
22 now.

23 **Q. And when we're talking about the furloughs and the**
24 **missed payments -- everything we talked about for those**
25 **facilities would have impacted all of the employees at all**

1 **the facilities.**

2 A. That were employed at that time, yes.

3 Q. **They all would have been treated the same way,**
4 **correct?**

5 A. Yes.

6 Q. **Under the same policy?**

7 A. Yes.

8 Q. **How many total employees do you think were**
9 **terminated in September of 2022?**

10 A. My best guess is probably around 200.

11 Q. **Have you ever heard of Platinum Medical Management,**
12 **Incorporated?**

13 A. Well, I think that's who we sent all of our
14 Certified Letters to. And I really don't know why. I think
15 maybe that's who Corey Gibboney had sent hers to. And we all
16 did the same thing. I'm not really sure.

17 Q. **Have you ever heard of TJ Holdings, Incorporated?**

18 A. No.

19 Q. **Crystal Green Management, Incorporated?**

20 A. No.

21 Q. **HC Management?**

22 A. No.

23 Q. **Harmonized Group, LLC?**

24 A. No.

25 Q. **Fortune 8?**

1 A. No.

2 Q. Paramount Real Estate Holdings, LLC?

3 A. No.

4 Q. Devine Grace Family Clinic, Inc.?

5 A. No.

6 Q. The District Lifestyle, LLC?

7 A. No.

8 Q. Heritage Property Management, LLC?

9 A. No.

10 Q. Joe Traders, LLC?

11 A. No.

12 Q. Go Bar, Inc.?

13 A. No.

14 Q. Jab Medical Systems, Inc.?

15 A. No.

16 Q. Platinum Senior Life, LLC?

17 A. No.

18 Q. NRG Investments, Inc.?

19 A. No.

20 Q. Daydra Management, LLC?

21 A. Yes.

22 Q. That's spelled D-a-y-d-r-a.

23 A. Yes.

24 Q. Tell me about that.

25 A. I believe that to be his construction company.

1 Q. His who?

2 A. Ryan Cole's construction company.

3 Q. Okay.

4 A. And I believe that in the beginning Daydra was
5 paying some of the expenses. But I'm not sure.

6 Q. Okay.

7 A. I just believe that.

8 Q. Why do you believe that?

9 A. I think that was the only operating account they
10 had at the time.

11 Q. Okay. Did Daydra Management, LLC, do any
12 construction work at any of the facilities?

13 A. No.

14 Q. They were just paying bills?

15 A. I believe so. In the beginning.

16 Q. Piku Enterprises?

17 A. No.

18 Q. That's P-i-k-u. Monmouth General Health Group,
19 LLC?

20 A. No.

21 Q. The District Lifestyle, II, LLC?

22 A. Is the question have I heard of it?

23 Q. Yes.

24 A. I have heard of it. And I think it's because I
25 read some things on line about that project going bust or

1 something.

2 Q. Studio 28/28, Inc.?

3 A. No.

4 Q. Kosh Kesh, Inc.?

5 A. No.

6 Q. That's K-o-s-h K-e-s-h. Metroplex Dermatology
7 Clinics, Inc?

8 A. No.

9 Q. Big World Development, Inc.?

10 A. No.

11 Q. Nanak, N-a-n-a-k, International Trade, Inc?

12 A. No.

13 Q. Diamond Investment Group, LLC?

14 A. No.

15 Q. Magahai, LLC?

16 A. No.

17 Q. That is M-a-g-a-h-a-i. Best Americare Visiting
18 Doctors, Inc.?

19 A. No.

20 Q. Full House Investments, Inc.?

21 A. No.

22 Q. Cotton Weave Estates, LLC?

23 A. No.

24 Q. Platnium Heights, LLC?

25 A. I don't think I have heard of that one.

1 **Q. Platinum Concepts, LLC?**
2 A. No.
3 **Q. Neighbors Visiting Doctors, LLC?**
4 A. No.
5 **Q. Stray Tower Services, LLC?**
6 A. No.
7 **Q. Paramount Real Estate Holdings, LLC?**
8 A. No.
9 **Q. Platinum Senior Living Wylie, LLC?**
10 A. No.
11 **Q. NG Investments, LLC?**
12 A. No.
13 **Q. SGG Construction Material?**
14 A. No.
15 **Q. Perryville Investments, LLC?**
16 A. No.
17 **Q. Pampered Princess?**
18 A. No.
19 **Q. Platinum In-patient, LLC?**
20 A. No.
21 **Q. New Edge?**
22 A. No.
23 **Q. Platinum Height Hospital, LLC?**
24 A. No.
25 **Q. Big World Entertainment, LLC?**

1 A. No.

2 Q. Platinum Neighborhood Services, Inc.?

3 A. I think Platinum Neighbors is what I have seen.

4 Q. Okay. Platinum Neighbors you think you have seen.

5 A. Yes. But not Neighborhood Services, no.

6 Q. Got it. Have you ever heard of New Health
7 Management Services, LLC?

8 A. I must have heard of it before. Because I knew it
9 was part -- or somehow affiliated with Nueterra.

10 Q. Do you know whether it is in any way affiliated
11 with Noble?

12 A. And when I say -- I want to say that's what I have
13 heard. So, I know nothing about a fact of that.

14 Q. Okay. Have you ever heard of the name Kevin
15 Standover?

16 A. No.

17 Q. David Eyers?

18 A. No.

19 Q. Scott Bleck?

20 A. No.

21 Q. Ronald Baker?

22 A. No.

23 Q. Travis Tasset?

24 A. No.

25 Q. Karen Moore?

1 A. No.

2 Q. Ron Baker?

3 A. No.

4 Q. Denise Mayhew?

5 A. No.

6 Q. Dan Tasset?

7 A. I have heard the name. And I believe that's
8 Jeremy's dad. But I have not met him or talked to him.

9 Q. How do you know that Dan Tasset is Jeremy's dad?

10 A. I think John Parigi told me that. And I don't know
11 how John Parigi knows. So it's hearsay.

12 Q. That's all right. We're not worried about hearsay
13 here today. Dennis Mayhew?

14 A. I don't know.

15 Q. Denise Mayhew?

16 A. I don't know.

17 Q. Have you ever heard of New Health Performance, LLC?

18 A. No.

19 Q. Have you ever heard of Nueterra Health Care Group
20 -- let me start over.

21 Nueterra Health Care Group Health and Welfare
22 Benefit?

23 A. No.

24 Q. Under Noble when it was a self-funded insurance
25 plan, did the plan have a name?

1 A. Not that I know of.

2 Q. Have you ever heard of something called a Form
3 5500?

4 A. I have heard of it.

5 Q. Were you ever involved in completing one?

6 A. No.

7 Q. Have you ever heard of Neuterra WC Holdings, LLC?

8 A. Not really at that name that I can remember.

9 Q. Have you ever heard of Nuetera MF Holdings, LLC?

10 A. No.

11 Q. Have you ever heard of Nuetera Capital?

12 A. I think that's what I have heard.

13 Q. In what context?

14 A. I mean I think that's just the name that I have
15 heard. Neuterra Capital. It never had anything to do with
16 Audrain. I just have heard it.

17 Q. Have you ever heard of Nupay, LLC?

18 A. No.

19 Q. N-u-p-a-y.

20 A. No.

21 Q. Have you ever heard of Health Care Partners Group,
22 LLC?

23 A. No.

24 Q. Have you ever heard of Highland Hill Capital?

25 A. Yes.

1 Q. What is that?

2 A. I have seen it on a lot of lawsuits.

3 Q. Okay.

4 A. But that's all I know.

5 Q. Okay. Do you know why they would be involved in a
6 lawsuit?

7 A. I don't know if they were one of the lenders that
8 Drew borrowed from. As aggressive as they had been, it makes
9 me think that.

10 Q. What do you mean aggressive?

11 A. They garnished the bank account -- the United
12 Health Care payments -- when they were one of the first out
13 of the shoot to do that.

14 Q. When you say United Health Care payments, what are
15 you referring to?

16 A. From the accounts receivable.

17 Q. Have you ever heard of IV Xpress, Incorporated?

18 A. So I believe that was Don Peterson's company.

19 Q. It's spelled IV Xpress. Do you know is that
20 company still in business?

21 A. I don't know.

22 Q. Have you ever heard of ASD Specialty Health Care,
23 Incorporated?

24 A. I don't think so. It sort of rings a bell. But I
25 can't bring it up as to why that is.

1 **Q. Have you ever heard of TriMedx Holdings, LLC?**

2 A. TriMedx? I think. I think they did our biomed.
3 TriMedx. I don't know if it was holdings though.

4 **Q. Okay. What is TriMedx?**

5 A. They were -- I think they were the service company
6 that fixed our equipment. And they filed a suit against us,
7 too.

8 **Q. Okay.**

9 A. That's who that name comes to mind.

10 **Q. TriMedx is spelled T-r-i-m-e-d-x.**

11 A. Yeah.

12 MR. WERTS: All right. Let's go off the record,
13 please.

14 THE VIDEOGRAPHER: The time is 2:15 p.m. We are
15 off the record.

16 (OFF THE RECORD.)

17 THE VIDEOGRAPHER: The time is 2:23 p.m. We're
18 back on the record.

19 **Q. (By Mr. Werts) All right. Back on the record**
20 **after a short break.**

21 We spoke a little bit earlier about the attorney
22 that you spoke to prior to the other deposition.

23 A. Yes.

24 **Q. Would his name have possibly been Richard Brown**
25 **instead of John Brown?**

1 A. There was a Richard --

2 Q. Okay.

3 A. -- that was an employee of Platinum that was an
4 attorney. And I did speak to him first. But he left
5 Platinum. I don't know why or when. And so I think at the
6 time that I was doing the deposition it was an outside
7 attorney. And I thought his name was John Brown.

8 Q. Okay. Fair enough. Have you ever heard the name
9 Ryan Gordon?

10 A. No.

11 Q. We talked a little bit about the documents that you
12 brought in today. And we'll go through those. Included on
13 that list were -- of what we requested -- were information
14 necessary to figure out who the different employees were.
15 Like their names and addresses.

16 A. Right.

17 Q. All of that was included in the file that you
18 provided, correct?

19 A. I don't know if their addresses are on there or
20 not.

21 Q. Okay. But that's something that we should be able
22 to figure out from the files at the hospital, correct?

23 A. I don't know where I would get -- you know, if they
24 are not on that, I don't know where else I would go to get
25 that.

1 Q. Okay.

2 A. When an employee signed up, everything went into
3 ADP -- or before it was UKG -- we would have paper copies in
4 our HR department.

5 Q. Okay.

6 A. So, yes.

7 Q. Okay. It exists somewhere, if it's not on that
8 thumb drive.

9 A. Yes. Please don't make me go do that.

10 Q. Okay. I'm going the try to leave you alone.

11 A. For \$25, please.

12 Q. \$67. So we have talked about a number of other
13 lawsuits. Are you aware of any other lawsuits that have been
14 filed to recover the wages that have been unpaid to all the
15 employees in this case?

16 A. I am not.

17 Q. Are you aware of any other lawsuits that have been
18 filed to recover the value of the unpaid employment benefits
19 in this case?

20 A. So, I mean the Department of Labor has sent me a
21 thing. But I don't know who filed that -- or I don't know
22 how that works.

23 Q. Okay.

24 A. So I'm familiar with the Department of Labor --
25 that talked to them about pay, and the other ones about

1 benefits.

2 Q. Okay.

3 A. So those are the only other two.

4 Q. Okay. And so then lawyers -- at least I tend to
5 draw a distinction between government investigations and
6 lawsuits.

7 A. Okay. Okay.

8 Q. And so I just want to narrow it down to lawsuits.
9 Are you aware of any other lawsuits besides this one?

10 A. No.

11 Q. And you said there are two different
12 investigations, one from the wage and hour people for the
13 unpaid pay, and the other from the ERISA people for the
14 unpaid benefits.

15 A. Yes.

16 Q. Have formal charges been filed in either of those
17 investigations yet as far as you know?

18 A. Not as far as I know.

19 Q. What did do to get ready for your deposition today?

20 A. I copied this for you.

21 Q. Okay. Thank you.

22 A. And I found those -- I mean I read the list of
23 things that you wanted. And those were the things that I
24 thought I had.

25 Q. Did you talk to anyone about the deposition?

1 A. Like did I tell people I was coming?

2 Q. Yeah.

3 A. In the letter --

4 Q. Those people?

5 A. Yeah, those people for sure.

6 Q. Anyone else?

7 A. This morning I told Jeff Stone -- I asked if he was
8 going to be here. I didn't know how these things worked --
9 whether it's a party or --

10 Q. We usually do them one at a time.

11 A. Okay. And he told me he didn't get a notice. I
12 think that's all.

13 Q. Have we talked about all the different payroll
14 companies that you worked with at your work at the hospitals
15 here today? Kronos and ADP?

16 A. Yes. I didn't work directly with them.

17 Q. Sure.

18 A. But that's who we used.

19 Q. Were there any accountancy firms that the hospitals
20 or the facilities worked with while you were CEO?

21 A. For payroll?

22 Q. Or any sort of accounting?

23 A. Yes. BKD. And I believe they did the cost report
24 for Fulton. We did not get one done for Audrain. Yes. And
25 then oh, my goodness. It's another big firm. And I believe

1 it's in Kansas City. And I believe it starts with a C. Any
2 thoughts on that one? There will be an e-mail from them.

3 **Q. Okay.**

4 A. Because that's who did the ERC filing. I just
5 can't think of their name.

6 **Q. Okay. Any others?**

7 A. Those are the only ones that I'm aware of.

8 **Q. Okay.**

9 A. Clifton, Larson, Allen.

10 **Q. Any other accountancy firms?**

11 A. Not that I know of.

12 **Q. Did you or the hospitals while you were CEO work
13 with any tax advisors that you're aware of?**

14 A. Not that I'm aware of.

15 **Q. What did you use for time keeping software?**

16 A. Kronos. And then I guess ADP.

17 **Q. And then what after ADP stopped doing it, how was
18 time kept?**

19 A. That should have been on paper.

20 **Q. Was that the same for all the employees?**

21 A. No. Some employees were still able to track their
22 time in ADP. And then we would print those time cards and
23 send them to Texas. But some couldn't get into ADP, and
24 obviously we couldn't add new people or anything or get them
25 fixed. So they kept theirs on paper, and then we sent those

1 with the batch.

2 Q. But essentially it was all reduced to paper that
3 was sent down to Texas for processing.

4 A. Yes.

5 Q. And who would you send those to in Texas?

6 A. Molly. And she had somebody helping her. So they
7 all went probably to our payroll department. And then they
8 sent them all to Platinum.

9 Q. All right. As we have talked about kind of
10 throughout the day, the goal of this lawsuit is to get the
11 employees, frankly including you, paid.

12 A. I hope we win.

13 Q. Is there anything else that you think that I need
14 to know that I haven't asked you about today to get that
15 done?

16 A. The only thing that I don't know is if the ERC
17 credits -- so those have been processed. Can those funds be
18 used by the current owners to pay the people?

19 Q. Do you know how much is expected in ERC credits?

20 A. You will see that in the e-mail. I believe that
21 it's going to be around four million dollars.

22 Q. Okay. Anything else?

23 A. That's all.

24 MR. WERTS: Okay. Well, thank you very much for
25 your time and patience today. I think he has couple of

1 questions. But I'm going to stop for now.

2 THE WITNESS: Okay.

3 - - -

4 EXAMINATION

5 QUESTIONS BY MR. STROMBERG:

6 Q. Thank you for your patience. You have been
7 answering a lot of very technical questions today. And I
8 don't want to keep you very long. I just have a few things I
9 just need some clarification on. As you know, I represent
10 New Health Management Services, LLC, and I'll just kind of
11 ask you a few questions.

12 You told us your e-mail addresses you had while you
13 worked at the Audrain facility. You didn't have a New Health
14 Management e-mail address, did you?

15 A. No.

16 Q. You didn't have any kind of Nueterra e-mail
17 address, is that correct?

18 A. No.

19 Q. And you talked about Dave Kitchens as a Corporate
20 Controller.

21 A. Correct.

22 Q. My recollection is correct on that?

23 A. Yes.

24 Q. And who is employed by?

25 A. I'm guessing Noble People.

1 Q. Okay. The reason I ask is just there were a couple
2 of times where there were references to the corporate office
3 being in Leawood. And when we're referring -- in your
4 testimony when you are referring in your testimony to the
5 corporate office in Leawood, you're talking about the Noble
6 People office in Leawood, is that correct?

7 A. Yes. Yeah. All of the -- like I believe that the
8 Noble Health rented that space as cubicles from Neuterra. I
9 believe that. Because their name was out on the building.
10 That's the only reason I would think that.

11 Q. But in your testimony today when you're referring
12 to the corporate office, you're referring to one of the Noble
13 entities.

14 A. Yes.

15 Q. There was some discussion about the various
16 decisions to furlough employees over the course of time. Now
17 in April 2020, was that the first --

18 A. '21.

19 Q. I'm sorry?

20 A. '22. April of '22.

21 Q. Well, I'm glad you corrected me. April 2022, that
22 decision, at that point Noble is operating the facilities, is
23 that correct?

24 A. On April 20th of '22 Noble sold it to Platinum.

25 Q. Okay. But did the furlough decision happen after

1 the sale?

2 A. No. The furlough decision happened on April 1st.

3 Q. Okay. I just wanted to make sure my time line was
4 correct.

5 A. Yes.

6 Q. And I believe you said you had met with the Noble
7 owners and Polsinelli --

8 A. Uh-huh.

9 Q. -- to discuss that decision, is that correct?

10 A. Yes.

11 Q. And again to make sure we're clear, when you were
12 referring to Noble owners at that time, were you referring to
13 Drew Solomon, Tom Carter and Don Peterson?

14 A. At that time it was just Drew and Tom.

15 Q. Okay. And because was John Parigi another person
16 that was involved in those conversations?

17 A. He was a consultant. So he was involved. And
18 Polsinelli lawyers.

19 Q. And I don't want to ask you what you said in those
20 conversations. But is it fair to say that no one from New
21 Health Management Services was taking part in that decision
22 making process?

23 A. No. No, they did not.

24 Q. And would the same be true for the later furlough
25 when that was with Platinum, and Platinum was making the

1 decision to furlough employees later on in 2022? Was anybody
2 from my client, New Health Management Services involved?

3 A. No. No. I never had anyone from New Health
4 Services involved in any operational discussions with me.

5 Q. So that would include any discussions ever about
6 payroll or benefits planning.

7 A. Correct.

8 Q. Excuse me. I'm going to jump around a little bit
9 little bit here. I don't get to go down a nice direct list
10 here. I have got to kind of go off what we've found.

11 I think you testified earlier that you had at some
12 point daily Teams calls with the corporate office.

13 A. Yes.

14 Q. And I think you named Aaron, and Don, Jeff Stone,
15 Jan Hoyt and Betty Loggerman.

16 A. Yes. There were other people, too.

17 Q. Do you remember any other names?

18 A. Yeah. David Kitchens was on there. And Bill --
19 Bill from the corporate billing office.

20 Q. And is it fair to say that these are all Noble
21 employees. Not anybody from New Health Management Services.

22 A. Correct.

23 Q. Did you sign any employment agreements with any of
24 these folks -- either the Noble entities or the Platinum
25 group?

1 A. Yes. The Noble Health Corp is who my contract is
2 with.

3 Q. And I think your testimony was that you were being
4 paid by Noble People.

5 A. Correct.

6 Q. And it's fair to say you've never been employed by
7 New Health Management Services in any way.

8 A. No.

9 Q. Not by any of the Neuterra entities?

10 A. No.

11 Q. When Noble was operating Audrain, do you think --
12 as a CEO is it a fair assessment to say that the buck on any
13 major decision stopped with Drew and Tom?

14 A. Yes.

15 Q. And then I guess at some point also Don, early on.

16 A. Early on. And then he dropped out in August. And
17 it was Drew, mostly.

18 Q. You touched a little bit on this earlier about, you
19 know, who is the decision maker to hire and fire employees.
20 Let's start first when Noble is operating Audrain. If
21 someone needed to be hired or fired, who is making that
22 decision?

23 A. In the beginning? The very beginning?

24 Q. Sure. Kind of take us through the history.

25 A. In the very beginning for Noble Audrain, if I was

1 bringing on -- so I hired a Vice-President of Patient Care
2 Services. And I did that -- I mean I told them I needed to
3 fill that position because I couldn't run the whole hospital.
4 And so they said sure, go ahead. And I hired that person.

5 As we began to have financial constraints -- which
6 probably started in June -- then every position had to be
7 approved by Drew.

8 **Q. Drew was the ultimate decision maker on that?**

9 A. Yes.

10 **Q. And then in the day-to-day operations of the**
11 **hospital, who is supervising the workers?**

12 A. Generally the department leader of the various
13 clinic departments that they would have been supervising.

14 **Q. And that person would have been employed by Noble**
15 **People?**

16 A. Correct.

17 **Q. Is that your understanding?**

18 A. Yes.

19 **Q. And as far as who made the decisions as far as**
20 **pay -- like the rate of pay and how people were going to be**
21 **paid?**

22 A. So a lot of our positions, you know, for nursing
23 and tech positions, they have a wage range already
24 established at the hospital. If we were going to be hiring
25 anything new -- especially in the professional position --

1 then we would talk it over with Drew and say, you know, do
2 you think we can offer this? They need this much. And he
3 would either approve it or decline it.

4 Q. And then now let's say -- I think in the last
5 couple of questions we have gone through we have talked about
6 the Noble time period. In the subsequent time period of
7 Platinum -- I'll kind run these back a little bit -- who had
8 the power to hire and fire?

9 A. So, Cory Countryman kind of replaced Drew in that
10 approval process. If I wanted to retain a nurse practitioner
11 who got offered more money somewhere else, I had to fill out
12 the paperwork and have Cory and Ryan sign off on it.

13 Q. So, Platinum has to give you the seal of approval
14 on hiring and firing?

15 A. Yes.

16 Q. And the same idea when you try to supervise
17 workers. Is that at that point still the supervisors of each
18 department?

19 A. Yeah, on site here. Because, you know, those
20 people were either in Kansas City or Texas. So, on site it
21 was the leaders. And then they would come to me with
22 whatever issues they would have.

23 Q. And the leaders at that time are employees of
24 Platinum.

25 A. Yes. At that time.

1 Q. Is that correct?

2 A. Yes.

3 Q. You know, that's a poor question. During the
4 Platinum time period --

5 A. Yes.

6 Q. -- when Platinum was the entity that was operating
7 the hospital, is the fair to say that Platinum employees were
8 also the supervisors of each department?

9 A. Yes.

10 Q. And the same concept while Platinum is operating
11 the hospital, they are the ones determining the rate of
12 pay?

13 A. Yes.

14 Q. And then as far as recordkeeping, who was in charge
15 of the records during the Noble operation period? Just the
16 work records like the employee files?

17 A. So, those were kept -- if it was paper records they
18 were kept -- we had an employee health file on the Audrain
19 campus for both facilities. And the employee file -- if
20 there were any disciplinary things -- those were also at the
21 Audrain campus. So Christy Smiley, the manager, was at the
22 Audrain campus. And she would go back -- and she had time at
23 Callaway and time at Audrain.

24 Q. And the pay records would be kept through the
25 vendor system?

1 A. On the electronic, yes.

2 Q. And who was in control of those both paper files at
3 the Audrain facility and then the vendor?

4 A. So the paper files were in the HR department, which
5 was in a different location than the payroll office, which
6 was in the accounting department. So payroll has the
7 information from payroll. And Human Resources has the
8 employment -- pre-employment, I-9 stuff. Disciplinary
9 stuff.

10 Q. And it's your understanding that's during the Noble
11 People time period -- those are employees of Noble People who
12 are controlling that information.

13 A. Yes. Yes.

14 Q. And then when Platinum took over is it Platinum
15 employees who were doing the same function?

16 A. Yes.

17 MR. STROMBERG: I don't think I have any further
18 questions at this time.

19 - - -

20 EXAMINATION

21 QUESTIONS BY MR. WERTS:

22 Q. Do you know one way or another whether New Health
23 Management Services is a subsidiary or has any relationship
24 to Nueterra?

25 A. I don't know.

1 MR. WERTS: I think those are the questions I have
2 for you today. Thank you very much.

3 THE VIDEOGRAPHER: The time is 2:45 p.m. We're off
4 the record.

5 MR. WERTS: So after a deposition you have the
6 right to review the deposition and to sign and make any
7 corrections to anything that you want. You also have the
8 right to waive that right in which case we will send you a
9 copy of the transcript.

10 THE WITNESS: So if I waive the right, I don't get
11 a copy? Is that what you said?

12 MR. WERTS: Correct. Well, actually I'll send you
13 -- if you want one I'll send you one. I will send you one
14 either way. But you have the right to review it and make any
15 corrections on what is called an errata sheet.

16 THE WITNESS: I don't want to do that.

17 MR. WERTS: Okay.

18 THE WITNESS: So I want to waive that. I can't
19 think of anything that I --

20 MR. WERTS: Okay.

21 THE WITNESS: I mean I just told the truth. So --

22 MR. WERTS: Oh, sure.

23 THE WITNESS: I don't think it's going to change.

24 MR. WERTS: It's more like a spelling type thing --
25 you're double-checking J.D.'s work is what it is. Or you can

1 just agree to trust him. A lot of people waive. Like every
2 doctor in the universe waives.

3 THE WITNESS: Yeah.

4 MR. WERTS: But some people do like to check it.

5 THE WITNESS: I remember waiving it the last time,
6 too.

7 MR. WERTS: Okay.

8 (OFF THE RECORD.)

9

10 (Deposition concluded at 2:45 p.m.)

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1 NOTARIAL CERTIFICATE

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I, J.D. Martin, Certified Court Reporter for the State of Missouri and a duly commissioned Notary Public within and for the State of Missouri, do hereby certify that the witness whose testimony appears in the foregoing deposition was duly sworn by me; that the testimony of said witness was taken by me to the best of my ability and thereafter reduced to typewriting under my direction; that I am neither counsel for, related to, nor employed by any of the parties to the action in which this deposition was taken, and further that I am not a relative or employee of any attorney or counsel employed by the parties thereto, nor financially or otherwise interested in the outcome of the action.


J.D. Martin, CCR (MO)



1 IN THE CIRCUIT COURT OF CALLAWAY COUNTY
2 STATE OF MISSOURI
3 JEANNETTE QUINN, individually)
4 and on behalf of all others) Case No. 22CW-CV00644
5 similarly situated)
6 v.)
7 PLATINUM TEAM MANAGEMENT,)
8 INC., et al.)

9 CERTIFICATE OF DEPOSITION

10 Comes now J.D. Martin and pursuant to Rule 57.03(g)(2)(a)
11 states as follows:

12 The deposition of AMY O'BRIEN was taken on FEBRUARY 22,
13 2023. The name and address of person or firm having
14 custody of the original transcript:

15 TODD C. WERTS
16 Lear Werts, LLP
17 103 Ripley Street
18 Columbia, Missouri 65201

19 At the time of delivery of the transcript the deposition
20 charges had not been paid. Payment status will be updated
21 at the request of the Court pursuant to Section 492.590(2)
22 RSMo.

23 
24 _____

25 J.D. Martin

26 LEXITAS LEGAL
27 711 N. 11th Street
28 St. Louis, Missouri 63101
29 (800) 280-3376

AMY O'BRIEN 2/22/2023

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